

Community Development Block Grant Program

2007 General Purpose Grant Application Handbook

September 2006

Applications for this grant are due: November 16, 2006

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WASHINGTON STATE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM 2007 GENERAL PURPOSE GRANT APPLICATION

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TABLE OF CONTENTS

Essential Inf	ormation	1
Changes in the	he 2007 Application	2
Suggestions	for Project Development	3
How to use t	he Application Handbook	5
SECTION 1	: CDBG GENERAL PROGRAM INFORMATION	
1-A	General Program Information	9
1-B	Map and List of Eligible Jurisdictions	15
1-C	Eligible and Ineligible Activities	19
SECTION 2	2: APPLICATION SUBMISSION	
2-A	Application Submission Guidelines	31
2-B	Application Checklist	33
SECTION 3	3: APPLICATION FORMS AND REQUIREMENTS	
3-A	Project Summary Form	37
3-B	Sample Resolution with Certifications of Compliance	41
3-C	Community Data Summary Form	45
3-D	Citizen Participation Requirements	47
3-E	HUD Disclosure Report	59
3-F	Low- and Moderate-Income Requirements	63
SECTION 4	1: APPLICATION NARRATIVE, BUDGET AND WORKPLAN	
4-A	Narrative Instructions	75
4-B	Narrative Statements (Rating Criteria and Questions)	77
4-C	CDBG Budget Forms and Instructions	83
4-D	Project Work Plan	93
4-E	Contact List	95
SECTION 5	5: APPENDICES	
Appendix	x A: Jurisdictions with 51% or Greater LMI Population (Based on HUD's 2000 Census Data)	99
Appendix	x B: 2006 Income Limits	
	x C: Community Survey Guide	
	x D: Federal and State Regulations	
	x E: Public Hearing Handouts (Spanish Version)	

ESSENTIAL INFORMATION 2007 GENERAL PURPOSE GRANT APPLICATION PROCESS

> DUE DATE

Applications must be hand-delivered by 5:00 p.m. or postmarked on or before **November 16, 2006**. It must be mailed by first class rate or higher. **Applications postmarked or hand-delivered to CTED after these deadlines will not be eligible.**

FAXED applications will **not** be accepted.

AWARD ANNOUNCEMENT DATE

CDBG awards will be announced by mid-March 2007. In most cases, grant contracts are fully executed within 90 days of the award announcement.

BASIC ELIGIBILITY QUESTIONS

Complete the application according to the instructions contained in this handbook, and be able to answer "Yes" to the following basic questions:

- Are you an eligible applicant?
- Is the project an eligible activity?
- Has principal benefit to low- and moderate-income citizens been documented?
- Has a public hearing been conducted?
- Have all the official forms been signed?

> ESSENTIAL SUBMISSION INFORMATION

Follow the submission information in Section 2 of this handbook and submit **ONE** application with original signatures, and **FOUR** copies to the following address:

CDBG Program

Department of Community, Trade and Economic Development 906 Columbia Street Southwest Post Office Box 42525 Olympia, Washington 98504-2525

➢ IF YOU HAVE QUESTIONS

Contact CDBG staff listed on the handbook title page if you have any questions as to whether your project is eligible or how to apply.

1

RECENT CHANGES TO THE APPLICATION PROCESS

CDBG Project Summary Form

This form has been reformatted to make it easier for you to complete. It is now two pages rather than one, but we think you'll appreciate the format.

Outcome Performance Measurement System

This system, required by the U.S. Department of Housing and Urban Development (HUD), enables us to report all accomplishments, both yours and ours, to Congress and the public. Beginning this year, you will notice that your CDBG contract will be asking for some additional information at the application point, during the project and at project closeout.

We view this as a positive process that will confirm to Congress and the public that the CDBG program is valuable to local jurisdictions and worthy of continued funding.

General Purpose Application and Forms Available Online

Also, please note that the entire General Purpose Application, including forms, are available online at http://www.cted.wa.gov/cdbg.

SUGGESTIONS FOR PROJECT DEVELOPMENT

The CDBG application process is competitive, generally requiring a high level of involvement and commitment by members of the applicant community. To assist applicants, a series of steps for selecting a project and getting started on the application process is provided below:

- **Read the Application Handbook** thoroughly to understand all requirements. Review community priorities identified in planning documents such as Comprehensive Plans and compare with CDBG-eligible activities; examine application guidelines; and <u>consult with CDBG Program staff</u> before proceeding with development of a CDBG application.
- Attend a CDBG application workshop during September 2006.
- **Determine** whether the project(s) being considered for submittal principally benefits low- and moderate-income persons. It is essential that the entire population to benefit from a project be identified, including areas outside an applicant jurisdiction's official boundary. At least 51 percent of the population to be served must have an income of 80 percent or less of the county median income as set forth in the 2006 Income Limits (Appendix B). See page 63 for more information and examples.

Consider the following definitions and guidelines:

- 1. If the proposed project will benefit an entire community, such as an expansion or upgrade of a wastewater treatment system, then the area benefit to low- and moderate-income persons must be determined. The percentage of low- and moderate-income persons within a community can be determined using either 2000 census data or by conducting a statistically valid survey. Surveys older than January 2001 will not be accepted.
- 2. If a proposed project is to exclusively benefit an area that is not defined by the 2000 census data (either an area larger or smaller than an incorporated jurisdiction that does not fit a census designated area), then a statistically valid survey must be conducted. Surveys conducted prior to January 2001 will not be accepted.
- 3. If the project is to benefit only low- and moderate-income households, such as a housing rehabilitation program, then general income data of the area is not required, but the proposal must describe its income qualification policies that ensure **direct benefit** to low- and moderate-income households.
- 4. If the project has both area and direct benefit components, such as a community center that will house some income qualifying programs but also will provide general community-use space, then the project must either qualify as an area benefit project OR area data and income qualification data can be combined to demonstrate the project's overall benefit to low- and moderate-income persons.
- Plan for community/citizen involvement before developing the application. Involve citizens who represent a cross-section of the community such as local officials, special interest groups, and civic organizations. Solicit their advice and participation early in the development of the project concept and proposal. This will build support for your project and eliminate any potential conflicts or duplication of effort. Citizen participation may be obtained through a variety of methods including town meetings, radio and newspaper advertisements, symposiums, work groups, surveys, etc. Strongly consider establishing a team or committee to assist in preparing a draft proposal. Schedule the required public hearing early during the proposal and application development process.

(Note: Early citizen participation activities can help identify sensitive issues before the public hearings and application submittal. Several applicants have discovered it is easier to identify and resolve issues before submittal than after a project is funded.) Refer to page 47 for the Citizen Participation Requirements Section.

- **Develop a work plan** for preparing the application which identifies the tasks to be completed, the steps that are necessary to meet the threshold requirements, the key individual(s) who will be responsible, a schedule for grant writing team meetings, and the time frames for assembly, editing, approval, copying, and delivery of the application by the due date. Develop the project concept as a team, but have one person do the actual writing.
- Collect preliminary data related to need, severity, community demographics, and financial condition of the applicant jurisdiction.
- Start the SEPA and NEPA Environmental Review process as early as possible.
- **Complete application proposal** in draft form as early as possible to allow time for review and "fine tuning" by the grant writing team as well as someone unfamiliar with the project.

Note: Many errors or misunderstandings could be eliminated by providing adequate review time prior to submitting the application.

- Then have an associate or friend not directly involved in your project, read your application looking specifically for:
 - ① Typos and grammatical errors
 - ② Inconsistencies in logic
 - 3 Budget items that are not clearly justified
 - Ways to eliminate confusing terms or jargon
 - © Unsupported statements, unfounded assumptions, or weak documentation
 - © Ways to improve the overall application impact
- **Review the draft proposal** with citizen groups, community leaders, and other stakeholders. Once these steps are complete, an applicant is ready to prepare the final CDBG application.
- Establish a schedule to obtain official signatures.

HOW TO USE THE APPLICATION HANDBOOK

This General Purpose Grant Application Handbook provides information about the State of Washington Community Development Block Grant Program and provides instructions and forms for preparing and submitting a funding request. We recommend that applicants review all the sections and our instructions before separating the materials.



NOTE: Every green page in this application contains pertinent information or required forms that **MUST** be provided by the applicant.

The handbook contains five sections including the appendices:

Section 1: **CDBG General Program Information:** Provides basic information about the CDBG Program, including funding availability, eligibility guidelines, special requirements, and funding limitations.

1-A: General Program Information

1-B: Chart and Lists of Eligible and Ineligible Jurisdictions

1-C: Eligible and Ineligible Activities

Suggestion: Read this section first to verify that your jurisdiction and proposed activity are eligible.

Section 2: **Application Submission:** Provides guidance on how the application must be structured: i.e., print size, spacing, and number of copies.

Suggestion: Review this early in your process, but don't worry about formatting until your application is complete. Then review and follow the instructions in this section.

Section 3: Application Forms and Requirements: Provides information needed to complete the application forms and certifications. All applicants must complete this section of the Application Handbook.

Suggestion: Schedule your first public hearing now. During that hearing, Section 3-B, Resolution, can be passed and Section 3-D, Citizen Participation Requirements, must be met. Second, complete the Income Survey Worksheet, which is necessary if an income survey is being used. Then, complete the Low- and Moderate-Income (LMI) Benefit Table, which is always required and necessary to verify that your project meets the requirement that at least 51 percent of the persons served by the grant have incomes within the LMI guideline. (Refer to Appendix B for the 2006 Income Limits.) As you near completion of the CDBG Application, complete the Project Summary Form and the Community Data Summary Form.

Section 4: **Instructions for Application Narrative:** Provides specific questions and rating criteria that must be addressed in the application. Each category of CDBG eligible projects is covered by the same set of General Purpose questions and rating criteria.

The five project categories are:

- A. Public Facilities
- B. Community Facilities
- C. Housing
- D. Economic Development
- E. Comprehensive*

*Comprehensive applications should clearly identify how the different activity areas are essential and necessary to complete simultaneously. Comprehensive projects must consist of elements that are absolutely integral to one another. Otherwise, the overall project rating will fail to match an average of the overall need for each component and may end up not receiving funds.

If submitting an economic development application, it is strongly recommended the applicant contact Dan Riebli, Program Manager, to obtain additional details.

Section 5: **Appendices:** Provides additional information that may be essential to completing an application or would be of value in determining the requirements that must be met if a CDBG award is made.

<u>Appendix A</u>: Lists jurisdictions with 51 percent or greater low- and moderate-income population (based on HUD's 2000 Census Data).

Appendix B: 2006 Low- and Moderate-Income Limits are needed to develop and administer income surveys and to qualify grant recipients for services if your project is designed to provide a direct benefit to low- and moderate-income persons or households.

<u>Appendix C</u>: Contains a Community Survey Guide that provides information and sample forms for developing and administering community needs and income surveys.

Appendix D: Lists Federal and State Regulations that may apply to the applicant's project.

Appendix E: Public Hearing Material (Spanish Version)

CDBG Program staff is available to help applicants develop competitive applications. Applicants are invited to contact any of the CDBG staff at (360) 725-3019 or at the individual phone numbers listed on the title page. They can provide advice on how to prepare more competitive proposals, provide clarification on income surveys and LMI requirements, confirm eligibility of proposed activities, and generally assist communities throughout the application process.

SECTION 1

CDBG GENERAL PROGRAM INFORMATION

This section provides an overview of the General Purpose Grant program. Use this section to determine jurisdiction and project eligibility. The information provided includes:

- 1-A CDBG General Program Information
- 1-B Chart and Lists of Eligible and Ineligible Jurisdictions
- 1-C Eligible and Ineligible Activities

SECTION 1-A. CDBG GENERAL PROGRAM INFORMATION

What is the CDBG Program?

The State of Washington Community Development Block Grant (CDBG) Program is a flexible, competitive source of federal funding for a broad range of community development activities. A fact sheet listing all CDBG funds is provided on page 55.

All projects must principally benefit low- and moderate-income (LMI) persons. (See 2006 Income Limits, Appendix B.)

General Purpose Grant funding is available for five categories of projects: housing, public facilities, community facilities, economic development, and comprehensive.

All local projects must meet at least one of three national objectives of the program (Title 1, Housing and Community Development Act of 1974, as amended) which are to:

- Principally benefit persons of low- and moderate-income
- Prevent or eliminate slums or blight
- Meet urgent community development needs which pose a serious and immediate threat to public health or safety

Applicants may request up to \$1,000,000 in grant funds during a single, annual General Purpose Grant competition to address eligible community development needs.

How much money is available for fiscal year 2007?

The State of Washington CDBG Program expects to allocate approximately \$7 million of its FY 2007 federal funding for General Purpose Grants to be distributed on a competitive basis to highly rated projects.

When will the money be available if my project is selected?

The CDBG Program will announce the 2007 General Purpose Grant awards by mid-March 2007. Funds will be made available as soon as contracting and the environmental release of funds process is complete. In most cases, contracts are fully executed within 90 days from award announcements.

Who can apply for CDBG?

Eligible applicants for CDBG funds are cities and towns with less than 50,000 people or counties with populations less than 200,000 provided that the cities, towns, and counties do not participate in HUD Urban county Consortiums. (See Section 1-B for a list of eligible and ineligible jurisdictions.)

Indian tribes and special purpose organizations, such as public housing authorities, port districts, water and sewer districts, community action agencies and economic development councils are not eligible to apply directly to the CDBG Program for funding. These projects may be eligible under CDBG if:

- A project will serve both an eligible local government's citizens and tribal members. If the boundaries of a project's service area involve both the local government and a tribal jurisdiction, the local government may apply for state CDBG funding on behalf of and in coordination with the Indian tribe.
- An eligible local government chooses to involve a special purpose organization in the operation of a project funded under the CDBG program.

What type of projects can be funded?

The following list identifies the most common types of eligible activities.

- Public Facilities
- Community Facilities
- Housing (Most new housing construction projects are not CDBG eligible. Contact CDBG program staff when considering new housing projects.)
- Economic Development
- Comprehensive
- Other Eligible Activities
- Public Services
- Local Match
- Administration
- Property Acquisition
- Relocation
- Barrier Removal

Page 19 contains an overview of eligible activities as well as a complete list of eligible and ineligible activities excerpted from Title I of the Housing and Community Development Act of 1974, as amended. **All projects must provide the intended benefits for a minimum of 10 years.** Verification of project eligibility with CDBG program staff is strongly advised before beginning an application.

What types of projects cannot be funded with CDBG funds?

<u>New Housing Construction</u> - CDBG funds generally may not be used to construct new housing units. In certain circumstances, with HUD's approval, CDBG funds may be used for the substantial reconstruction of housing owned and occupied by low- and moderate-income persons. Activities in support of new housing construction may also be eligible under certain conditions. Communities considering applications for these activities should consult with CDBG Program staff before proceeding.

<u>Regular Government Operations</u> - CDBG funds may not be used to fund the ongoing responsibilities of general local government.

<u>Maintenance and Operation</u> - Maintenance and operation expenses of public or community facilities are not eligible, with the exception of an eligible public service activity.

<u>Equipment</u> - The purchase of motor vehicles, equipment, or furnishings not permanently attached to a building is ineligible except when necessary as part of an eligible public service or for fire protection. Park equipment such as bleachers or picnic tables purchased with CDBG funds must be permanently affixed.

Government Buildings - Government buildings such as courthouses, city halls, county administrative buildings, and other buildings used predominantly for the general conduct of government are not eligible for CDBG assistance except for the removal of architectural barriers that deny access to the disabled.

<u>Income Payments</u> - CDBG funds may not be used for income payments such as payment for income maintenance, housing allowances, down payments, or mortgage subsidies.

<u>Political Activities</u> - CDBG funds may not be used to finance the use of facilities or equipment for political purposes or to engage in other partisan political activities.

What special requirements and funding limitations apply to the application process?

Before an application can be reviewed and rated, it will be screened to determine whether or not it conforms to the following requirements and funding limitations. Actions necessary to comply with these special requirements are detailed in the application instructions.

• Resolution with Certifications of Compliance

The applicant's local legislative body must pass a resolution authorizing the chief administrative official to submit the CDBG application to the Department of Community, Trade and Economic Development (CTED) and certifying compliance with state and federal laws and specific program requirements. A sample resolution can be found on page 41. The resolution must be signed by the authorized chief administrative official, and a signed copy <u>must</u> be included with the application.

• Citizen Participation Requirements

Title I of the Housing and Community Development Act of 1974, as amended, requires each applicant to identify its community development and housing needs, including the needs of low- and moderate-income persons, through a documented citizen participation process. To meet the requirements of this act, the jurisdiction must publish a public hearing notice and conduct a public hearing as described on page 47.

• Principal Benefit to Low- and Moderate-Income (LMI) Persons

A CDBG General Purpose Grant proposal must principally benefit low- and moderate-income persons. "Principal benefit" is defined as at least 51 percent benefit to LMI persons. LMI is 80 percent of county median income. An application which fails to adequately demonstrate the manner in which the proposed activities will provide such benefit will not advance to the rating and selection stage. See the LMI Requirements for options and guidance for calculating this percent of benefit on page 63.

Maximum Average CDBG Investment Per Household Benefited Requirement

Each application for CDBG General Purpose Grant funding must be structured so the CDBG investment per household benefited does not exceed the following limits:

	Maximum Average CDBG
Project Category	Investment Per Household
Community Facilities	\$10,000
Public Facilities	\$10,000
Economic Development	\$10,000/job
Housing	\$25,000*
Comprehensive	Above amounts applied
	as applicable

^{*}Up to \$35,000 per unit for projects that include lead-based paint mitigation activities.

Local Financial Match

No local financial match is required; however, local contribution, both financial and in-kind, is highly favored during rating and selection.

Maximum Number of Applications

Eligible jurisdictions may submit only one application for the 2007 General Purpose Grant cycle. It is possible for an eligible jurisdiction to apply for a CDBG General Purpose Grant, and other CDBG Program funds within the same program year.

Flood Plain Insurance

The applicant must provide evidence of enrollment in the National Flood Plain Insurance Program if the project will affect a flood plain.

What happens to my application when it arrives at CTED?

The selection process for CDBG General Purpose Grant proposals consists of three stages: threshold review, rating and selection and announcing the recipients.

Threshold Review (Stage 1)

Threshold review is conducted by CDBG Program staff to determine if each application meets eligibility and minimum application requirements. This stage typically takes about two weeks. When conducting the threshold review, Program staff may contact the applicant to resolve threshold issues. Although no new information will be requested or accepted, we advise applicants to designate someone who is knowledgeable about the project to be available during the review period. No points are awarded during this stage; however, applications failing to meet minimum threshold requirements will not advance to the rating and selection stage. All threshold requirements are listed in the Application Checklist, page 33.

Rating and Selection (Stage 2)

The rating and selection process is an evaluation of each application, using criteria described in Section 4-A (Narrative Instructions). Applications are evaluated by project category and assigned points in five separate groups which correspond to the five primary project categories: housing, economic development, community facilities, public facilities, and comprehensive. If the state receives an application containing unrelated activities in one or more project categories, the activities will be rated separately in appropriate project categories and the total score for the application will be the sum of the proportionally weighted points awarded to each project category.

Typically, applications for unrelated activities do not score well. CTED reserves the right to contact informed third parties including local, state, and federal agencies and to make site visits to assist in the evaluation process. An applicant must receive at least 65 points in order to receive funding consideration. Applications receiving scores of 65 points or greater will be funded in rank order until available funds are obligated.

Applications will be evaluated and assigned points based on the following:

Need Statement 25 Points

Capacity Statement 25 Points

Readiness Statement 25 Points

Results Statement <u>25 points</u>

100 points

Recipients Announced (Stage 3)

When the rating process is complete, applicant jurisdictions will be listed in rank order according to assigned scores. Funding recommendations will be made to CTED management for ranked projects with requests totaling the amount of funds available for 2007 General Purpose Grants. After receiving management approval, legislators will be notified and all applicants will receive verbal and written notice of the rating process results. It is expected that 2007 CDBG General Purpose Grant recipients will be announced in mid-March 2007. Funds will be available as soon as contracting and the environmental review requirements are complete.

How does the actual contracting process work once grants are announced?

Following notification of project selection, a grant contract is negotiated and prepared for each funded jurisdiction. During the contract negotiation period, any questions regarding proposed activities, additional resources, administration costs, and other aspects of the project identified during the rating process will be discussed and resolved. Community surveys will be reviewed during this period to review methodology and verify the number and percentage of low- and moderate-income beneficiaries.

Grants consisting of more or less than the amount originally requested may be awarded at CTED's discretion based on discussions between CDBG Program staff and the jurisdiction. **The preliminary notice of project selection does not imply approval of all activities or all costs proposed in the selected application.** The grant contract, once negotiated, is the legal document which governs the administration of the grant and includes:

- Amount of CDBG funds provided.
- Detailed budget for implementation of project activities and the scope of work to be completed.
- Schedule for implementation of project activities.
- General and special terms and conditions associated with the grant.
- Application, as approved.

Delays in completing the execution of a final contract of ninety days or more from the date of the award letter, due to the project's readiness to proceed, may lead to the rescission of this award and an invitation to apply during the next CDBG General Purpose Grant application cycle.

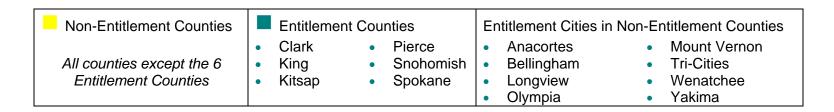
No CDBG funds can be released until the grant contract has been fully executed, the SEPA and NEPA environmental reviews have been completed, and CDBG has issued a Release of Funds letter.

SECTION 1-B. MAP AND LISTS OF ELIGIBLE JURISDICTIONS

This map shows the relationship between eligible and ineligible communities, and is to be used as reference when reviewing the requirements and lists within the Application Handbook. It may help as a reference when reviewing the complete list of eligible and ineligible jurisdictions that appears on the next two pages. Please also consult Appendix A for a complete list of jurisdictions with 51 percent or greater LMI population, based on the 2000 census data.



2006 CDBG Entitlement/Non-Entitlement Jurisdictions



Lists Of Eligible And Ineligible Jurisdictions

1. Eligible Jurisdictions

a. Non-Entitlement Cities and Towns:

Aberdeen George Northport Goldendale Albion Oak Harbor Grand Coulee Almira Oakesdale Asotin Grandview Oakville **Benton City** Granger Ocean Shores Hamilton Bingen Odessa Blaine Harrah Okanogan Brewster Harrington Omak Hartline Oroville **Bridgeport** Bucoda Hatton Othello Burlington Hoquiam Palouse Ilwaco Cashmere **Pateros** Castle Rock Ione Pe Ell Cathlamet Kahlotus Pomeroy Centralia Kalama Port Angeles Port Townsend Chehalis Kelso Chelan Kettle Falls Prescott Chewelah Prosser Kittitas Clarkston Krupp Pullman Cle Elum Lacey Quincy Colfax La Conner Rainer College Place La Crosse Raymond Colton Lamont Reardan Colville Langley Republic Ritzville Conconully Leavenworth Riverside Concrete Lind Connell Long Beach Rock Island Cosmopolis Lyman Rosalia Coulee City Lynden Roslyn Coulee Dam Mabton Royal City Sedro Woolley Coupeville Malden Creston Mansfield Selah Cusick Marcus Sequim Davenport Shelton Mattawa McCleary Soap Lake Dayton East Wenatchee South Bend Mesa Metaline Electric City South Cle Elum Ellensburg Metaline Falls Sprague Elma Montesano Springdale Elmer City Morton St. John Endicott Starbuck Moses Lake **Entiat** Mossyrock Stevenson **Ephrata** Moxee Sumas Everson Naches Sunnyside Farmington Napavine Tekoa Ferndale Nespelem Tenino **Forks** Newport Tieton Friday Harbor Nooksack Toledo Garfield North Bonneville Tonasket

Toppenish Tumwater **Twisp** Union Gap Uniontown Vader Waitsburg Walla Walla Wapato Warden Washtucna Waterville West Richland Westport White Salmon Wilbur Wilson Creek Winlock Winthrop Yelm

Zillah

b. Non- Entitlement Counties:

Adams Ferry Klickitat Skagit Franklin Lewis Skamania Asotin Garfield Benton Lincoln Stevens Chelan Grant Mason Thurston Clallam Grays Harbor Okanogan Wahkiakum Pacific Columbia Island Walla Walla Whatcom Cowlitz Jefferson Pend Oreille San Juan Whitman Douglas Kittitas Yakima

2. Ineligible Jurisdictions

a. Entitlement Cities and Towns:

Duvall Sammamish Airway Heights Maple Valley Marysville Sea Tac Algona Eatonville Edgewood Medical Lake Seattle Anacortes **Edmonds** Arlington Medina Shoreline Auburn Enumclaw Mercer Island Skykomish Bainbridge Island Everett Mill Creek Snohomish Battle Ground Snoqualmie Fairfield Millwood Beaux Arts Federal Way South Prairie Milton Village Fife Monroe Spangle Mount Vernon Bellevue **Fircrest** Spokane Bellingham Gig Harbor Mountlake Spokane Valley Black Diamond Gold Bar Terrace Stanwood Bonney Lake **Granite Falls** Mukilteo Steilacoom Bothell **Hunts Point** Newcastle Sultan Normandy Park Bremerton Index Sumner North Bend Tacoma Brier Issaquah Kennewick Olympia Buckley Tukwila Burien Kent Orting University Place Camas **Pacific** Vancouver Kenmore Carbonado Kirkland Pasco Washougal Carnation La Center Port Orchard Waverly Lake Forest- Park Wenatchee Cheney Poulsbo Wilkeson Clyde Hill Lake Stevens Puvallup Covington Lakewood Redmond Woodinville Darrington Renton Woodland Latah Woodway Deer Park Liberty Lake Richland Des Moines Yacolt Longview Ridgefield Du Pont Rockford Yakima Lynnwood Yarrow Point Roy

b. Entitlement Counties:

Clark Kitsap Snohomish King Pierce Spokane

Ruston

SECTION I-C. ELIGIBLE AND INELIGIBLE ACTIVITIES

1. Overview

A summary of the General Purpose Grant eligible activities is provided below:

• <u>Public Facilities</u> - General Purpose Grant may be used to design, construct, or reconstruct water and sewer systems, flood and drainage facilities, solid waste disposal facilities, streets, and sidewalks. Public facilities projects must serve existing low- and moderate-income neighborhoods and communities.

CDBG can fund the special assessments for low- and moderate-income homeowners, if the improvements being funded meet CDBG requirements, such as Labor Standards and Environmental Review. For purposes of the CDBG program, "special assessment" is defined as the recovery of the capital costs of a completed public improvement through:

- 1) a fee or charge levied or filed as a lien against a parcel of real estate as a direct result of a benefit derived from the installation of a public improvement; or
- 2) a one-time charge made as a condition of access to the improved public system.

Low- and moderate-income property owners cannot be assessed or charged a fee to recover the capital costs of any CDBG-funded public facility. Prospective applicants are advised to contact CDBG Program staff when considering funding for special assessments.

This public facility category also includes acquisition, design, construction, or rehabilitation of fire protection facilities, and purchase of fire protection equipment.

Eligible parks and recreation projects include acquisition, design, site preparation, drainage, construction, and rehabilitation of parks and recreation facilities. Acquisition of land for open space is also eligible.

• <u>Community Facilities</u> - General Purpose Grants may be used for acquisition, design, construction, or reconstruction of community facilities to serve low- and moderate-income youth, elderly, or other low- and moderate-income groups with special needs. Community facility projects must provide the intended benefit for at least 10 years.

CDBG funds may be used to rehabilitate publicly owned, historic properties that are sites or buildings listed, or eligible to be listed, in the National Register of Historic Places or in state or local inventories.

 <u>Economic Development</u> - General Purpose Grant may be used for acquisition, construction, or reconstruction of commercial or industrial buildings; cooperative or employee stock ownership programs; special training and accessibility modifications designed to increase employment opportunities for disabled persons; downtown revitalization; and assistance to private for-profit entities such as grants, loans, loan guarantees, interest supplements, or technical assistance for implementing projects. Economic development activities may be implemented by private forprofit entities when the project will create or retain permanent jobs primarily for low- and moderate-income people or when the business provides services primarily to residents of an area with a majority of low- and moderate-income persons, <u>provided the need for public funds is clearly balanced by the extent of public benefit received.</u>

The economic development category also includes grants for revolving loan funds. Applications for revolving loan fund grants must demonstrate a need for loan capital assistance, and/or loan packaging assistance, beyond what is currently provided by existing programs, such as the Rural Washington Loan Fund and the Community Development Finance Program. CTED encourages applications that clearly demonstrate a sufficient public benefit. Public benefit is defined as the creation or retention of at least one full-time equivalent (FTE) permanent job per \$10,000 of CDBG General Purpose Grant funds used. Unless a specific business (or businesses) is identified in the application as a confirmed, eligible participant, the overall need for this type of assistance must have been documented as meeting the public benefit criteria.

• <u>Housing</u> - General Purpose Grants may be used to fund projects to provide permanent low-cost housing opportunities for low- and moderate-income families such as shared housing, housing cooperatives, mobile home parks, manufactured housing, and self-help housing programs.

As of 2005, housing rehabilitation projects must seek CDBG funding through the CDBG Housing Rehabilitation Grant program, with its separate application process.

The cost of rehabilitating the water or sewer side service connections for eligible housing or the construction cost of connecting eligible housing to available water and sewer systems is eligible for General Purpose Grant funding. While design and construction of new housing and on-site improvements for new housing are generally ineligible activities, some activities in support of new housing construction, such as land acquisition and off-site improvements, are eligible. With HUD approval, CDBG funds may be used to fund new housing construction when such activities are undertaken by eligible (1) neighborhood-based nonprofit organizations, (2) small business investment companies or (3) local development corporations. Prospective applicants are advised to contact CDBG Program staff when considering new housing construction.

- <u>Comprehensive</u> A comprehensive project includes activities listed in at least two of the other categories. For example, neighborhood revitalization by improving streets, sewer, water, and housing, is considered comprehensive. These activities must be related and coordinated to achieve more results than would be possible when addressed individually.
- Other Eligible Activities The following activities are eligible, and depending on the context, may qualify as elements of any of the above project categories:
 - Public Services CDBG can fund public services such as employment, crime prevention, childcare, health, drug abuse, education, energy conservation, and welfare or recreation needs programs. The amount requested for public services cannot exceed 15 percent of the total grant requested and the public service activity must directly support the larger project. CDBG generally cannot fund public service projects that have been funded with local or state funds within the previous calendar year.

- <u>Local Match</u> CDBG funds may be used for the non-federal share required by other federal or state grant programs used to support CDBG-eligible activities.
- Relocation CDBG funds may be used for relocation payments and assistance to permanently or temporarily displaced individuals, families, or businesses. All CDBG proposals that may cause displacement must include relocation assistance in the project plan and budget.

2. Complete List Of Eligible And Ineligible Activities

Title 1 of the Housing and Community Development Act of 1974, as amended is the congressionally adopted statute from which most of the CDBG Program regulations are developed. Section 105(a) identifying eligible activities is reproduced, in its entirety, below:

ELIGIBLE ACTIVITIES

Sec. 105 (a) Activities assisted under this title may include only:

- (1) the acquisition of real property (including air rights, water rights, and other interests therein) which is (A) blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth; (B) appropriate for rehabilitation or conservation activities; (C) appropriate for the preservation or restoration of historical sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development; (D) to be used for the provision of public works, facilities, and improvements eligible for assistance under this title; or (E) to be used for other public purposes.
- (2) the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.
- (3) code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area.
- (4) clearance, demolition, removal, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for rehabilitation, and rehabilitation of privately owned properties and including the renovation of closed school buildings).
- (5) special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons.
- (6) payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this title.

- (7) disposition (through sale, lease, donation or otherwise) of any real property acquired pursuant to this title or its retention for public purposes.
- (8) provisions of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, energy conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by the said unit, or received by such unit from the state in which it is located) during any part of the twelve-month period immediately preceding the date of submission of the statement with respect to which funds are to be made available under this title, and which are to be used for such services, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government, except that not more than 15 percent of the amount of any assistance to a unit of general local government under this title may be used for activities under this paragraph unless such unit of general local government used more than 15 percent of the assistance received under this title for fiscal year 1982 or fiscal year 1983 for such activities (excluding any assistance received pursuant to Public Law 98-8), in which case such unit of general local government may use not more than the percentage or amount of such assistance used for such activities for such fiscal year, whichever method of calculation yields the higher amount.
- (9) payment of the non-federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under this title.
- (10) payment of the cost of completing a project funded under Title I of the Housing Act of 1949.
- (11) relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate.
- (12) activities necessary (A) to develop a comprehensive community development plan, and (B) to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively (i) determine its needs, (ii) set long-term goals and short-term objectives, (iii) devise programs and activities to meet these goals and objectives, (iv) evaluate the progress of such programs in accomplishing these goals and objectives, and (v) carry out management, coordination, and monitoring of activities necessary for effective planning implementation.
- (13) payment of reasonable administrative costs related to establishing and administering federally approved enterprise zones and payment of reasonable administrative costs and carrying charges related to the planning and execution of community development and housing activities, including the provision of information and resources to residents of areas in which community development and housing activities are to be concentrated with respect to the planning and execution of such activities, and including the carrying out of activities as described in section 701(e) of the Housing Act of 1954 on the date prior to the date of enactment of the Housing and Community Development Amendments of 1981.
- (14) provision of assistance including loans (both interim and long term) and grants for activities which are carried out by public or private nonprofit entities, including (A) acquisition of real property. (B) acquisition, construction, reconstruction, rehabilitation, or installation of (i) public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and (ii)

commercial or industrial buildings or structures and other commercial or industrial real property improvements; and (iii) planning.

- (15) assistance to neighborhood-based nonprofit organizations, local development corporation, nonprofit organizations serving the development needs of the communities or non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of Section 101(c), and assistance to neighborhood-based nonprofit organizations, for the purpose of assisting, as part of neighborhood revitalization or other community development, the development of shared housing opportunities (other than by construction of new facilities) in which elderly families (as defined in Section 3(b)(3) of the United States Housing Act of 1937) benefit as a result of living in a dwelling in which the facilities are shared with others in a manner that effectively and efficiently meets the housing needs of the residents and thereby reduces their cost of housing.
- (16) activities necessary to the development of energy use strategies related to recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as:
- (A) an analysis of the manner in, and the extent to which energy conservation objectives will be integrated into local government operation, purchasing and service delivery, capital improvements budgeting, waste management, district heating and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions.
- (B) a statement of the action the recipient will take to foster energy conservation and the use of renewable energy resources in private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low- and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities.
- (17) provisions of assistance to private, for-profit entities, when the assistance is necessary or appropriate to carry out an economic development project.
- (18) the rehabilitation or development of housing assisted under Section 17 of the United States Housing Act of 1937.
- (19) provision of assistance to facilitate substantial reconstruction of housing owned and occupied by low-income persons (A) where the need for reconstruction was not determinable until after rehabilitation under this section had already commenced, or (B) where the reconstruction is part of a neighborhood rehabilitation effort and the grantee (i) determines the housing is not suitable for rehabilitation, and (ii) demonstrates to the satisfaction of the Secretary that the cost of substantial reconstruction is significantly less than the cost of new construction and less than the fair market value of the property after substantial reconstruction.
- (20) provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities, which

assistance shall not be considered a planning cost as defined paragraph (12) or administrative cost as defined in paragraph (13).

- (21) housing services, such as housing counseling, energy auditing, preparation of work specification, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in housing activities authorized under this section, or under Title II of the Cranston-Gonzalez National Affordable Housing Act, except that activities under this paragraph shall be subject to any limitation on administrative expenses imposed by any law.
- (22) provision of assistance by recipients under this title to institutions of higher education having a demonstrated capacity to carry out eligible activities under this subsection for carrying out such activities.
- (23) provision of assistance to public and private organizations, agencies, and other entities (including nonprofit and for-profit entities) to enable such entities to facilitate economic development by:
- (A) providing credit (including providing direct loans and loan guarantees, establishing peer lending programs) for the establishment, stabilization, and expansion of microenterprises.
- (B) providing technical assistance, advice, and business support services (including assistance, advice, and support relating to developing business plans, securing funding, conducting marketing, and otherwise engaging in microenterprise activities) to owners of microenterprises and persons developing microenterprises.
- (C) providing general support (such as peer support programs and counseling) to owners of microenterprises and persons developing microenterprises.
- (24) activities necessary to make essential repairs and to pay operating expenses necessary to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low-income neighborhoods.
- (25) provision of direct assistance to facilitate and expand home ownership among persons of low-income (except that such assistance shall not be considered a public service for purpose of paragraph (8) by using such assistance to:
- (A) subsidize interest rates and mortgage principal amounts for low-income home buyers.
- (B) finance the acquisition by low-income home buyers of housing that is occupied by the home buyers.
- (C) acquire guarantees for mortgage financing obtained by low-income home buyers from private lenders (except that amounts received under this title may not be used under this subparagraph to directly guarantee such mortgage financing and grantees under this title may not directly provide such guarantees).
- (D) provide up to 50 percent of any down payment required from low-income home buyer.

- (E) pay reasonable closing costs (normally associated with the purchase of a home) incurred by low-income home buyer.
- (b) Upon the request of the recipient of assistance under this title, the Secretary may agree to perform administrative services on a reimbursable basis on behalf of such recipient in connection with loans or grants for the rehabilitation of properties as authorized under subsection (a)(4).
- (c)(1) In any case in which an assisted activity described in paragraph (14) or (17) of subsection (a) is identified as principally benefiting persons of low-income, such activity shall:
- (A) be carried out in a neighborhood consisting predominately of person of low-income and provide services for such person.
- (B) involve facilities designed for use predominately by person of low-income.
- (C) involve employment of persons, a majority of whom are persons of low-income.
- (2)(A) In any case in which an assisted activity described in subsection (a) is designed to serve an area generally and is clearly designed to meet identified needs of persons of low-income in such area, such activity shall be considered to principally benefit persons of low income if (i) not less than 51 percent of the residents of such area are persons of low-income; (ii) in any metropolitan city or urban county, the area served by such activity is within the highest quartile of all areas within the jurisdiction of such city or county in terms of the degree of concentration of persons of low-income; or (iii) the assistance for such activity is limited to paying assessments (including any charge made as a condition of obtaining access) levied against properties owned and occupied by persons of low-income to recover the capital cost for a public improvement.
- (B) The requirements of subparagraph (A) do not prevent the use of assistance under this title for the development, establishment, and operation for not to exceed 2 years after its establishment of a uniform emergency telephone number system if the Secretary determines that.
- (i) such system will contribute substantially to the safety of the residents of the area served by such system.
- (ii) not less than 51 percent of the use of the system will be by persons of low-income.
- (iii) other federal funds received by the grantee are not available for the development, establishment, and operation of such system due to the insufficiency of the amount of such funds, the restrictions on the use of such funds, or the prior commitment of such funds for other purposes by the grantee. The percentage of the cost of the development, establishment, and operation of such a system that may be paid from assistance under this title and that is considered to benefit low-income persons is the percentage of the population to be served that is made up of persons of low-income.
- (3) Any assisted activity under this title that involves the acquisition or rehabilitation of property to provide housing shall be considered to benefit persons of low-income only to the extent such housing will, upon completion, be occupied by such persons.

INELIGIBLE ACTIVITIES

Although ineligible activities are not specifically identified in Title I, the Code of Federal regulations (CFR's), developed from the statute, provide guidance. According to 24 CFR 570.207, the general rule is that any activity that is not authorized under the provisions of 570.201 - 570.206 of this Subpart is ineligible to be carried out with CDBG funds. This section identifies three specific activities that are ineligible and provides guidance thought to be necessary in determining the eligibility of several other activities frequently associated with housing and community development.

- (A) the following activities may not be carried out using CDBG funds:
- (1) Buildings or portions thereof used predominantly for the general conduct of government cannot be assisted with CDBG funds. Such buildings include, but are not limited to: city halls and other headquarters of government where governing body of the recipient meets regularly, courthouses, and other state or local government office buildings. This does not exclude, however, the removal of architectural barriers under Subpart 570.201 (k) and historic preservation under 570.202(d) involving any such building. Also, where acquisition of real property includes an existing improvement which is to be utilized in the provision of a building or facility for the general conduct of government, the portion of the acquisition cost attributable to the land is eligible provided such acquisition meets a national objective, (570.208).
- (2) General government expenses. Except as otherwise specifically authorized in this Subpart or under OMB Circular A-87, expenses required to carry out the regular responsibilities of the unit of general local government are not eligible for assistance under this Part.
- (3) Political activities. CDBG funds shall not be used to finance the use of facilities or equipment for political purposes or to engage in other partisan political activities, such as candidate forums, voter transportation, or voter registration. However, a facility originally financed in whole or in part with CDBG funds may be used on an incidental basis to hold political meetings, candidate forums, or voter registration campaigns, provided that all parties and organizations have access to the facility on an equal basis, and are assessed equal rent or use charges, if any.
- (B) The following activities may not be carried out with CDBG funds unless authorized under provisions of 570.203 or as otherwise specifically noted herein, or when carried out by a subrecipient under the provisions of 570.204.
- (1) Purchase of equipment. The purchase of equipment with CDBG funds is generally ineligible.
- (i) Construction equipment. The purchase of construction equipment is ineligible, but compensation for the use of such equipment through leasing, depreciation, or use allowances pursuant to OMB Circulars A-87 or A-122 as applicable for an otherwise eligible activity is an eligible use of CDBG funds. However, the purchase of construction equipment for use as part of a solid waste disposal facility is eligible under Subpart 570.201(c).
- (ii) Fire protection equipment. Fire protection equipment is considered for this purpose to be an integral part of a public facility and thus, purchase of such equipment would be eligible under 570.201(c).

- (iii) Furnishings and personal property. The purchase of equipment, fixtures, motor vehicles, furnishings, or other property which is not an integral structural fixture is generally ineligible. CDBG funds may be used, however, to purchase, or to pay depreciation or use allowances (in accordance with OMB Circulars A-87 or A-122, as applicable), for such items when necessary for use by a recipient or its subrecipients in the administration of activities assisted with CDBG funds, or when eligible as fire fighting equipment, or as a public service pursuant to Subpart 570.201(e).
- (2) Operating and maintenance expenses. The general rule is that any expense associated with repairing, operating or maintaining public facilities and services is ineligible. Specific exceptions to this general rule are operating and maintenance expenses associated with public service activities, interim assistance and office space for program staff employed in carrying out the CDBG program. For example, where a public service is being assisted with CDBG funds, the cost of operating and maintaining that portion of the facility in which the service is located is eligible as part of the public service. Examples of ineligible operating and maintenance expenses are:
- (i) Maintenance and repair of streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for the handicapped, parking and similar public facilities. Examples of maintenance and repair activities for which CDBG funds may not be used include the filling of pot holes in streets, repairing cracks in sidewalks, the mowing of recreational areas, and the replacement of expended street light bulbs.
- (ii) Payment of salaries for staff, utility costs and similar expenses necessary for the operation of public works and facilities.
- (3) New housing construction. Assistance may not be used for the construction of new permanent residential structures or for any program to subsidize or finance such new construction, except:
- (i) As provided under the last resort housing provisions set forth in 49 CFR Part 24.
- (ii) As authorized under 570.201(m).
- (iii) When carried out by a subrecipient pursuant to 570.204(a).
- (4) Income payments. The general rule is that assistance shall not be used for income payments for housing or any other purpose. Examples of ineligible income payments include payments for income maintenance, housing allowances, down payments and mortgage subsidies.

SECTION 2

APPLICATION SUBMISSION

This section will walk you through our formatting guidelines. There is also a checklist that will ensure all application materials have been included before you submit it.

- 2-A Application Submission Guidelines
- 2-B Application Checklist

SECTION 2-A. APPLICATION SUBMISSION GUIDELINES

When is my application due?

Applications must be hand-delivered by 5:00 p.m. or postmarked on or before **November 16, 2006**. It must be mailed by first class rate or higher. **Applications postmarked or hand-delivered to CTED after these deadlines will not be eligible.**

FAXED applications will not be accepted.

When submitting, please:

- Complete the application according to instructions in this handbook.
- Submit **ONE** application with original signatures, and **FOUR** copies to the following address:

CDBG Program
Department of Community, Trade and Economic Development
906 Columbia Street SW
Post Office Box 42525
Olympia, Washington 98504-2525

What are the format guidelines?

General Application Information

- Print Size No smaller than 10 characters per inch (12 point font).
- Spacing Double space.
- Page Numbering Is recommended.
- Total number of narrative pages, not including the work plan or budgets, should not exceed 25.
- Attachments It is recommended to tab each attachment to assist the CDBG Rating and Selection Team in locating the reference material.
- Source Documentation Provide all source documents as attachments. If the documents exceed two pages, excerpt or summarize them and note the source.
- Letters of Support Letters documenting participation or support by sectors of the community, or letters verifying contribution of resources are appropriate. These letters should be submitted as attachments to the application.

What order should application parts be assembled?

Threshold Documentation (See pages 37-61)

- Project Summary Form
- Resolution with Certifications of Compliance
- Community Data Summary Form
- Citizen Participation Documentation
- HUD Disclosure Report
- Income Survey Worksheet (if applicable)
- Low- and Moderate-Income (LMI) Benefit Table (page 69)
- Narrative Explanation of how information was derived
 - -see row I & J of the LMI Benefit Table

Need Statement (page 77)

• Your narrative response to the application questions and rating criteria.

Capacity Statement (page 78)

• Your narrative response to the application questions and rating criteria.

Readiness Statement (page 79)

- Your narrative response to the application questions and rating criteria.
- Work Plan Form (page 93)
- Budget Instructions and Assumptions (page 83)
- CDBG Budget Forms (page 85)
- Contact List (page 95)

Results Statement (page 81)

• Your narrative response to the application questions and rating criteria.

Attachments

- Documentation for Narrative Statements
- Maps (Jurisdiction and Service Area if different than the jurisdiction)
- Proof of Flood Insurance (if applicable)
- Pictures
- Architect/Engineer cost estimates, etc.

What application requirements are most often overlooked by jurisdictions?

The checklist on the next page can be used as a quick reference for the most frequently omitted CDBG application requirements.

SECTION 2-B. APPLICATION CHECKLIST (For Applicant Use Only)

1.	Will the application (one original and four copies) be received by 5 p.m., November 16, 2006, or postmarked first class by November 16, 2006?	YES	□NO
2.	Is the Project Summary Form complete and signed by the authorized Chief Administrative Official? (An original signature must be submitted.)	YES	□NO
3.	Is the lead applicant listed as an eligible jurisdiction?	YES	□NO
4.	Does the application contain a copy of the signed resolution, with Certifications of Compliance adopted through formal action by the governing body (i.e., City Council, County Board of Commissioners), which certifies compliance with state and federal laws and requirements?		□NO
5.	Has the lead applicant submitted only one General Purpose Grant application for 2007?		□NO
6.	. Does the application contain only eligible activities and costs as per CDBG guidelines?		□NO
7.	Is the request within the \$1,000,000 limit?		□NO
8.	Does the average CDBG investment per household meet the following limits?	YES	□NO
	Maximum Average CDBG Project Category Investment Per Household		
	Community Facilities \$10,000 Public Facilities \$10,000 Economic Development \$10,000/job Housing \$25,000* Comprehensive Above amounts applied as applicable		
	*Up to \$35,000 per unit for projects that include lead-based paint mitigation activities.		
9.	Has proof of enrollment in the National Flood Plain Insurance Program been provided?	YES	□NO
10.	Has the HUD Disclosure Report been completed and included in application?	YES	□NO
11.	Has the Community Data Summary Form been completed and included in the application?	YES	□NO
12.	Has an Outreach and Accommodation for Non-English Speaking Residents form been completed and submitted?	YES	□NO

13.	Are the appropriate parts and forms coorder as listed in Section 2-A?	omplete and assembled in the appropriate	YES	□NO
14.	Does the project principally benefit L	MI persons?	YES	□NO
15.	Does each listed activity benefit at lea	st 51% LMI persons or households?	YES	□NO
16.	If an income survey is used, are the results documented and valid according to method and sample size? See chart below for appropriate sample size.			□NO
	Required Sample Group Sizes For Universes of Various Sizes			
	Column A	Column B		
	Number of Households in the Universe	Sample Group Size Needed to Complete Responses Required	_	
	1-49	1-49 (100%)		
	50-55	50		
	56-63	55		
	64-70	60		
	71-77	65		
	78-87	70		
	88-99	80		
	100-115	90		
	116-133	100		
	134-153	110		
	154-180	125		
	181-238	150		
	239-308	175		
	309-398	200		
	399-650	250		
	651-1,200	300		
	1,201-2,700	350		
	2,701 or more	400		
17.	7. When census data, rather than a survey, is used to determine LMI percentage and the community is not listed in Appendix A, is a map of official census tracts, correlating to service area included?		YES	□NO
18.	Is a clear, readable map of the jurisdic application?	etion and the service area included in the	YES	□NO

SECTION 3

APPLICATION FORMS AND REQUIREMENTS

This section contains the following general application instructions, requirements and forms that must be completed and returned as part of the application package:

- 3-A Project Summary Form
- 3-B Sample Resolution With Certifications of Compliance
- 3-C Community Data Summary Form
- **3-D** Citizen Participation Requirements
- 3-E HUD Disclosure Report
- 3-F Low- and Moderate-Income Requirements

All forms are available on our website: http://www.cted.wa.gov/cdbg. If you need an electronic form emailed to you, call (360) 725-3019 or cdpsupport@cted.wa.gov.

Section 3-A CDBG Project Summary Form

Read instructions before you fill out this form. Some questions may not apply to your grant.

1.	Type of	Community Investment Fund	Imminent Threat
		□ General Purpose Grant	☐ Planning-Only Grant
		☐ Housing Enhancement	☐ Public Services Grant
		☐ Housing Rehabilitation	
2.	Jurisdiction:		Phone:
	Email:		Fax:
	Address:		City/Zip:
	Tax ID#:		County(ies):
	SWV#:		
3.	Contact		Title:
	Address:		City/Zip:
	Phone:		Fax:
	Email:		
4.	Subrecipient:		Title:
7.	Contact		Phone:
	Email:		Fax:
	Address:		City/Zip:
5.	Consultant: Email:		Phone: Fax:
	Address:		City/Zip:
	Address.		City/Zip.
6.	Fiscal Year:	From to	
7.	State Legislativ	ve District: Congressional Dis	strict:
8.	Project		
	Summary:		
9.	Did a CDBG Pla	anning-Only grant lead to this	
9.	application?		☐ Yes ☐ No
	(does not apply	to Planning-Only applications)	
10.	Project Category:	Community Facilities Public Fac	Eilities
(chec	ck all that apply)	Comprehensive Housing	☐ Planning ☐ Public Services

Section 3-A CDBG Project Summary Form

Read instructions before you fill out this form. Some questions may not apply to your grant.

11.	National Objective:	Principally ber households,		d moderate-income (LMI) persons or
		Prevents or elin	ninates slums o	or blight.
		Meets urgent co		elopment needs that pose a serious and alth or safety.
12.	Project Budget:	CDBG	\$	
		Other Federal	\$	*State funds include CSBG and
		State*	\$	HTF dollars. See instructions for more detail.
		Local Public	\$	more detain.
		Private	\$	
		TOTAL:	\$	
13.	Project Beneficiaries:	# Persons:		
		# LMI Persons:		
		# Households:		
		# LMI Households:		
14.	How were the benefi	ciaries determined?	☐ 2000 Co	ensus Income Survey Date:
15.	Certification of Chi	ef Administrative O	fficial:	
			Signature	Date
			Print Name	Title

Section 3-A CDBG Project Summary Form

Read instructions before you fill out this form. Some questions may not apply to your grant.

Instructions

The Project Summary Form serves as the cover page for the application and should be the first page inside the cover.

- 1. Select the type of grant you are applying for.
- 2. The applicant jurisdiction must be a non-entitlement city or county. The Tax Identification number is usually a "91-" number. If a jurisdiction has a statewide vendor (SWV) number, it should be included on this form.
- 3. Provide information on the contact person, should we need more information about your project. If funded this person will be the main contact for the CDBG contract.
- 4. Provide information on any subrecipient organization that will benefit from the project or receive CDBG funds as a pass through.
- 5. Provide information on the consultant used to develop the proposal, if applicable.
- 6. List the month and day of the applicant's fiscal year from beginning to end.
- 7. List the numbers of the state and congressional districts.
- 8. Provide a brief project summary, highlighting what is to be accomplished and the major elements of the project.
- 9. You do not need to answer this question if you are applying for a Planning-Only Grant.
- 10. Check the appropriate project category. Some may not apply to your type of grant.
- 11. You must list the percentage of LMI benefit. Also, It is not necessary to address more than one national objective.
- 12. List the project budget. State funds include Housing Trust Fund (HTF) and Community Services Block Grant (CSBG) dollars.
- 13. List number of people, households, people qualifying as LMI, and households qualifying as LMI that will benefit from the project.
- 14. Select how beneficiaries are determined. If you completed an income survey please list the date of the survey.
- 15. This form must be signed by the Chief Administrative Official (mayor, county commission chair, county administrator, or city manager as applicable). Print the official's name and title. An original signature must be submitted.

SECTION 3-B. SAMPLE RESOLUTION WITH CERTIFICATIONS OF COMPLIANCE

WHEREAS, (name of city, town, or county) is applying to the state Department of Community, Trade and Economic Development for funding assistance;

WHEREAS, it is necessary that certain conditions be met as part of the application requirements;

WHEREAS, (name of chief administrative official and title) is authorized to submit this application to the State of Washington on behalf of (name of city, town, or county);

NOW, THEREFORE, be it resolved that the (name of city, town, or county) authorizes submission of this application to the state Department of Community, Trade and Economic Development to request \$ (amount of funding requested) to (project description), and certifies that, if funded, it:

Will comply with applicable provisions of Title I of the Housing and Community Development Act of 1974, as amended, and other applicable state and federal laws;

Has provided opportunities for citizen participation comparable to the state's requirements (those described in Section 104(a)(2)(3) of the Housing and Community Development Act of 1974, as amended); has complied with all public hearing requirements and provided citizens, especially low- and moderate-income persons, with reasonable advance notice of and the opportunity to present their views during the assessment of community development and housing needs, during the review of available funding and eligible activities, and on the proposed activities;

Has provided technical assistance to citizens and groups representative of low- and moderate-income persons that request assistance in developing proposals;

Will provide opportunities for citizens to review and comment on proposed changes in the funded project and program performance;

Will not use assessments against properties owned and occupied by low- and moderate-income persons or charge user fees to recover the capital costs of CDBG-funded public improvements from low- and moderate-income owner-occupants;

Will establish a plan to minimize displacement as a result of activities assisted with CDBG funds; and assist persons actually displaced as a result of such activities, as provided in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended;

Will conduct and administer its program in conformance with Title VI of the Civil Rights Act of 1964 and the Fair Housing Act, and will affirmatively further fair housing (Title VIII of the Civil Rights Act of 1968); and has adopted (or will adopt) and enforce a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and has adopted (or will adopt) and implement a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstration within its jurisdiction, in accordance with Section 104(1) of the Title I of the Housing and Community Development Act or 1974, as amended; and

Will provide, upon request, and prior to any obligation of funds being made, a complete and accurate CDBG Federal Funds Disclosure Report detailing the required applicant/grantee information and, as appropriate, other government assistance provided or applied for, interested parties and expected sources, and uses of funds.

(Name of city, town, or county) designates (name of city manager, county administrator, mayor) as the authorized Chief Administrative Official and the authorized representative to act in all official matters in connection with this application and (name of city, town or county)'s participation in the State of Washington CDBG Program.

Signature	_ Date
Name	Title
Attested	_ Date

RESOLUTION WITH CERTIFICATIONS OF COMPLIANCE INSTRUCTIONS

The applicant's local legislative body must pass a resolution authorizing the chief administrative official to submit the CDBG application to CTED and certifying compliance with state and federal laws and specific program requirements. See Appendix D for a summary of these federal and state regulations.

Retype the sample resolution provided on the previous page, inserting local and project specific information as indicated. The CDBG amount you list in the resolution must not be less than the actual amount request in the application budget. This resolution may be reformatted to meet the jurisdiction's requirements for official resolutions.

The resolution must be signed by the authorized chief administrative official, and a signed copy must be included with the application. The chief administrative official is the mayor, county commission chair, county administrator or city manager.

A resolution that references another project submitted previously for CDBG funding will not be accepted.

SECTION 3-C. COMMUNITY DATA SUMMARY FORM

The Community Data Summary Form provides general demographic and financial information about the applicant jurisdiction and the project.

The information is used by the CDBG review team to analyze and compare similar projects.

GF	ENERAL DEMOGRAPHICS	
a.	Jurisdiction Name	
b.	Population in jurisdiction	
c.	Population in the target area if smaller or larger than the jurisdiction	
d.	Number of households in jurisdiction	
e.	Number of households in the target area if smaller or larger than the jurisdiction	
f. g.	Number of Hispanic or Latino residents Number of residents by racial origin within the jurisdiction or target area as reques	ted by HUD:
	White American Indian/Alaskan Asian Native Hawaiian/Pacific Is African American Other	
	local surveys have not been conducted, data for some of these racial categories can cessing the 2000 U.S. Census Bureau website at http://www.factfinder.census.gov : Enter the city/town or county and select Washington. Hit GO. Scroll down to the General Characteristics heading and look under the "one race Use the numbers provided under the 'numbers' column for each race category and designation. The Hispanic or Latino numbers should not be included in the total numbers they are not racial classifications.	e" category. d the Hispanic
i.	Number of female Head of Households Number of elderly persons We unemployment rate of jurisdiction for the most current year (available from and Economic Analysis [LMEA]: 1-800-215-1617)	n the Labor Market

2. LOCAL FINANCIAL CONDITION

Note: Applications in support of a special purpose district need to answer only questions applicable to the target district. If the jurisdiction is not authorized under state law to levy any one of the following taxes or rates, insert N/A in the appropriate space.

1.

SUBMIT THIS FORM WITH APPLICATION

a.	Total current regular-levy propert evaluation.	ty tax rate per \$1,000 assessed	
	Maximum regular levy property to The amount that <u>can be</u> obligated.	<u>-</u>	
	Does the current rate reflect an in the 101 percent levy increase limit	crease from the prior year equivalit in CH.84.55.RCW?	ent to YES NO
3. FL	OOD PLAIN INSURANCE PR	OGRAM	
a. V	Will the proposed project affect a	flood plain?	☐ YES ☐ NO
b. V	Will the proposed project be locate	ed in a flood plain?	☐ YES ☐ NO
		S, then the jurisdiction must be enentation of enrollment must be p	
		<u>fema.gov</u> . On the bottom-left find Floo continue to follow the prompts until you f	
	blic facilities proposals and comprete the following:	rehensive proposals which include	e public facilities activities, please
4. U	TILITY RATES		
Use	e the residential rate for all utilitie	s.	
a.	Current average monthly residen	ntial rate for water, sewer and garb	page:
	Water \$	Sewer \$	Garbage \$
b.	Anticipated average monthly resproject without CDBG assistant	sidential rate for water, sewer and	garbage after completion of
	Water \$	Sewer \$	Garbage \$
c.	Anticipated average monthly reproject with CDBG assistance:	sidential rate for water, sewer and	garbage after completion of
	Water \$	Sewer \$	Garbage \$
d.	Month/year of most recent incre	ease for each utility:	
	Water	Sewer/	Garbage/
e.	Amount and percent of most rec	cent increase:	
	Water \$	Sewer \$	Garbage \$
	Water%	Sewer%	Garbage%

SECTION 3-D. CITIZEN PARTICIPATION REQUIREMENTS



The contents of Part D include detailed information as to how to meet the federally mandated citizen participation requirements. Immediately following the requirements you will find sample notices and handouts.

Review ALL the materials with the staff person responsible for public hearings and establish a timeline for completion. You can't start on this aspect of your application too soon.

To apply for CDBG funds, a jurisdiction must show it has involved its citizens in the CDBG application process and complied with the specific federal citizen participation requirements outlined in 24 CFR 570.486. These regulations are provided on page 57. The purpose of these citizen participation activities is to inform the residents and the decision-makers of the availability of CDBG funds and to provide residents the opportunity (especially LMI persons) to present potential projects and input on proposed projects.

If a jurisdiction intends to apply for more than one type of CDBG grant during the same year, it is advisable to contact the CDBG office to discuss how to coordinate these citizen participation and public hearing requirements.

SUMMARY

The minimum citizen participation requirements for the submission of a CDBG application are:

- 1. Conduct at least one public hearing prior to submission of the CDBG application. This hearing must be held at a convenient time and location to encourage citizen participation.
- 2. Publish an official announcement of the hearing, providing reasonable advance notice. A sample public hearing notice with required language is provided on page 53.
- 3. Distribute information on the availability of CDBG funds and the eligible uses at the public hearing. Sample fact sheets are provided on page 55. The hearing minutes must reflect that these handouts were distributed at the public hearing.
- 4. Review local demographic data to determine if it is reasonable to expect a significant number of non-English speaking residents to participate in the public hearing and advertise and conduct the public hearing in accordance with this determination. Detailed guidance on providing and documenting Outreach and Accommodation for Non-English Speaking Residents is provided on page 51.
- 5. Adopt a grievance procedure for the use of CDBG funds. A sample grievance procedure is provided on page 58.
- 6. Document that the notice was published and the hearing was held. A documentation checklist is provided on the next page.

REQUIRED CITIZEN PARTICIPATION DOCUMENTATION

THE FOLLOWING DOCUMENTS MUST BE SUBMITTED WITH THE APPLICATION:

- ✓ A copy of the public hearing minutes, including a statement that the CDBG required handouts were distributed.
- ✓ A copy of the affidavit of publication or a copy of the actual notice from the newspaper.
- ✓ The Outreach and Accommodation for Non-English Speaking Residents form, documenting the review and determination of local data on non-English speaking populations, the list of outreach steps (if applicable) and accommodations made.
- ✓ A copy of the jurisdiction's adopted Grievance Procedure.

See the following pages for more important information on these requirements. \Rightarrow

DETAILED INFORMATION ON THE REQUIREMENTS

1. Public Hearing Logistics

What is a public hearing? – A public hearing is a meeting of a governmental body during which the public is invited to the council or board of county commissioners, who will primarily listen and receive public input. A public hearing may be held as part of a regularly scheduled public meeting where official decisions may then be made or where it is elected to made a decision at a subsequent meeting.

Who must conduct the hearing? – The applicant city, town or county. Although some applications are developed by other community organizations or special districts, these organizations cannot conduct the hearing and have it meet CDBG requirements.

When must the hearing be held? – Prior to submission of the CDBG application and within 18 months of the application submittal date.

Where must the hearing be held? – The hearing location must be accessible to persons of disability. The location must also be convenient for persons likely impacted by the proposed project. This is particularly relevant for a county proposing a project in a community that is far from the county seat.

2. Public Hearing Notice

When must the advance notice be made? – Generally, a legal notice is published at least one week prior to the hearing date. The notice must meet the local public hearing notice requirements.

Where must the notice be made? – The hearing must be well advertised, generally in the official local paper. In addition, public notice can be made using community bulletin boards, local newsletters, billing statements, newspaper articles or door-or-door distribution. Residents within those areas in which CDBG funds are proposed to be used, especially the low- and moderate-income persons, should be encouraged to attend or provide comment.

What must the notice say? – A sample notice is provided on page 53.

3. Public Hearing Purpose

What must the CDBG hearing cover? – The hearing is to obtain citizens' views and respond to proposals and questions. It must cover community development and housing needs and the availability of CDBG funds. The CDBG Program handout materials are to be distributed. Additional handout materials describing the proposed project(s) are advisable. A copy of the handout information in Spanish is provided in Appendix E and in English on page 55.

4. Meeting the Needs of Non-English Speaking Residents

All applicants must complete the Outreach and Accommodation Form on page 51. This form provides guidance on meeting this requirement, lists potential outreach steps and accommodations, and outlines how to document the efforts. The CDBG public hearing should not be advertised or conducted without first ensuring appropriate outreach and accommodations are accomplished.

The federal regulations on page 57 state that "public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate." The applicant jurisdiction must review local demographic data and consider the potential impacts of the proposed project to determine the appropriate outreach steps and accommodations to meet the needs of non-English speaking residents.

Data on the number and percent of non-English speaking residents in a jurisdiction can be found by accessing the 2000 Census website at http://www.factfinder.census.gov and then following these directions:

- Enter the city/town or country and select Washington State and hit **GO**.
- Scroll down to **Social Characteristics** heading and select show more.
- Scroll down to nearly the bottom of the table to the **LANGUAGE SPOKEN AT HOME** heading and identify the other languages spoken, such as Spanish.
- Under the predominant other language spoken, look for the percentage of the population that speaks English less than "very well."
- Use these percentages to determine whether specific outreach or additional accommodations are necessary to meet the needs and encourage participation from non-English speaking residents.

Contact the CDBG office for assistance in accessing and interpreting this data.

5. Grievance Procedure

What must the procedure do? – The grievance procedure must provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable. A sample procedure to be adopted is provided on page 58.

 \sqrt{NOTE} : If funded, an additional public hearing will be required towards the end of the project to review and receive comments on the project's performance. This final public hearing should be included in your proposal's Work Plan. Also if funded, a public hearing would be required if activities are proposed to be added, deleted or substantially changed from the original proposal.

CITIZEN PARTICIPATION FORMS AND SAMPLE DOCUMENTS

See the following pages for assistance in meeting the requirements ⇒

 $\sqrt{\textit{HELPFUL HINT}}$: Plan for the required initial public hearing NOW! Decide the hearing date and then work backward to determine when and how the public announcement must be published to allow sufficient notice time and outreach.

OUTREACH AND ACCOMMODATION FOR NON-ENGLISH SPEAKING RESIDENTS FORM

This form documents the applicant jurisdiction's determination whether additional public hearing outreach and accommodations for local non-English speaking residents are required and lists the outreach steps and accommodations provided. The federal regulations state that "public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate." The CDBG Program benefits low- and moderate-income persons and strongly encourages a jurisdiction to make efforts to receive input on community needs from minority populations. To meet the CDBG requirements for outreach and accommodation for non-English speaking residents, the jurisdiction must:

- $\sqrt{}$ Complete and submit this form with the application.
- $\sqrt{}$ Properly advertise the public hearing (see the sample public hearing notice's accommodation clause options) and submit a copy of the notice with the application.
- $\sqrt{}$ Follow the public hearing notice and provide any necessary accommodations at the public hearing.

Significant Population - General guidance is if 2000 Census data show that more than 10 percent of the jurisdiction's population speaks English less than "very well" or if more than 10 percent of the project's targeted population speak English less than "very well," then it is reasonable to expect and encourage a significant number of non-English speaking residents to participate. In such cases, special outreach and accommodations are recommended to inform this population of the opportunity to receive information on the CDBG Program and input on the proposed project. (See B. and D.)

OUTREACH - Complete either A. or B., as applicable.

To document that targeted outreach to non-English speaking residents was NOT necessary, check the box and provide any additional explanation:
Data on local non-English speaking populations, including 2000 Census Data, demonstrate that it is NOT reasonable to expect a significant number of non-English speaking residents to attend the CDBG application public hearing. See previous page for assistance on accessing 2000 Census Data.

Explain below any local circumstances that contribute to your interpretation of the data:

If you were able to check the A. box above, you can skip B. and complete C.

	would participate in the public hearing, check the boxes that apply:
	The CDBG public hearing notice was advertised in an alternate language.
	The CDBG public hearing was announced on an alternate language radio or television station.
	The CDBG public hearing notice in an alternate language was posted in advance at the following locations to target the non-English speaking population:
	Location Date Posted 1.
	2.3.4.
	Members of organizations and advocacy groups representing non-English speaking populations were invited to attend the CDBG public hearing.
	Leaders and interested parties from the minority community were directly invited to attend the CDBG public hearing.
	Other:
<u>AC</u>	COMMODATIONS - Complete either C. or D. as applicable
C.	For jurisdictions where it was determined a significant number of non-English speaking residents were NOT expected to participate (A. box is checked above), the following minimum
	accommodation was made available:
□ D.	accommodation was made available: The CDBG public hearing notice states that arrangements to reasonably accommodate the needs of special classes of citizens, including handicap accessibility or interpreter, will be made upon advance notice request. Submit a copy of the affidavit of publication or a copy of the actual notice from the
D.	accommodation was made available: The CDBG public hearing notice states that arrangements to reasonably accommodate the needs of special classes of citizens, including handicap accessibility or interpreter, will be made upon advance notice request. Submit a copy of the affidavit of publication or a copy of the actual notice from the paper to document. For jurisdictions where a significant number of non-English speaking residents were expected to
D.	accommodation was made available: The CDBG public hearing notice states that arrangements to reasonably accommodate the needs of special classes of citizens, including handicap accessibility or interpreter, will be made upon advance notice request. Submit a copy of the affidavit of publication or a copy of the actual notice from the paper to document. For jurisdictions where a significant number of non-English speaking residents were expected to participate (B. box is checked above), the following accommodations were all made: The CDBG public hearing notices state that an interpreter will be available (even without advance request). Submit a copy of the affidavit of publication or a copy of the actual notice from the paper;

SAMPLE PUBLIC HEARING NOTICE

Additional information can be added to these required clauses to meet specific local announcement needs and to encourage participation.

If a jurisdiction intends to apply for more than one type of CDBG grant during the same year, it is advisable to contact the CDBG office to discuss how to coordinate these citizen participation and public hearing requirements.

Where/When:	NOTICE IS HEREBY GIVEN that a public hearing will be held by the (city council/county board of commissioners) in the (council chambers/hearing room), (location), on (date and time).
Basic Clause:	The purpose of the public hearing is to review community development and housing needs, inform citizens of the availability of funds and eligible uses of the state Community Development Block Grant (CDBG), and receive comments on proposed activities, particularly from low- and moderate-income persons and persons residing in the (name of area) area.
Clause describing the availability of funds and eligible uses:	Up to \$1,000,000 may be available to the (<i>city/county</i>) on a statewide competitive basis to fund public facility, housing, economic development, or community facility projects that principally benefit low- and moderate-income persons.
Comment clause:	The draft application for the (<i>project name</i>) proposal will be available for review at the (<i>location – government office and/or library</i>), (<i>time and date</i>). Comments may also be submitted in writing to (<i>city/county</i>), (<i>time period</i>).
Accommodation clause: For applicants who checked box C. in the Outreach and Accommodation Form.	The (council chambers/hearing room) is handicap accessible. Arrangements to reasonably accommodate special needs, including handicap accessibility or interpreter, will be made upon receiving 24-hour advance notice. Contact (name) at (number, location).
Or For applicants who checked box D. in the Outreach and Accommodation Form.	A (<i>insert alternate language</i>) interpreter will be available. The (<i>council chambers/hearing room</i>) is handicap accessible. Additional arrangements to reasonably accommodate special needs will be made upon receiving 24-hour advance notice. Contact (<i>name</i>) at (<i>number, location</i>).



washington state department of community, trade and economic development

Community Development Block Grant

Local Government Division

For More Information

Peter McMillin Managing Director 360.725.3005 Peterm@cted.wa.gov

Dan Riebli CDBG Program Manager 360.725.3017 Danr@cted.wa.gov

Sheila Lee-Johnston CDBG Project Manager 360.725.3009 Sheilal@cted.wa.gov

Bill Prentice CDBG Project Manager 360.725.3015 Billp@cted.wa.gov

Sharon Robinson CDBG Project Manager 360.725.3010 Sharonr@cted.wa.gov

Kaaren Roe CDBG Project Manager 360.725.3018 Kaarenr@cted.wa.gov

Leona Moon CDBG Program Coordinator 360.725.3022 Leonamo@cted.wa.gov

Introduction

The Washington State Community Development Block Grant (CDBG) Program provides funds on a competitive basis for housing, infrastructure, and community facilities, economic development, and planning projects that principally benefit low- and moderate-income (LMI) households.

The Washington State CDBG Program is funded by the U.S. Department of Housing and Urban Development (HUD). The purpose of the state CDBG Program is to improve and maintain the environment of eligible, non-entitlement cities and counties in order to enhance the quality of life for LMI residents and, as a result, benefit the entire community.

Funds Available

For 2007 it is anticipated that approximately \$15 million in federal funds will be awarded to Washington State. It is proposed that funds be distributed as follows:

General Purpose Grant

\$7,000,000

Contact: Bill Prentice

Annual grant cycle during which eligible applicants may request up to \$1,000,000 per application for housing, infrastructure, community facilities, or economic development/microenterprise projects principally benefiting LMI persons. The application due date for the 2007 grant cycle is November 16, 2006, with awards announced mid-March 2007.

Community Investment Fund Grant

\$ 3,356,516

Contact: Dan Riebli

Provides technical and financial assistance to eligible communities of up to \$1,000,000 per application throughout the year on a funds available basis for housing, infrastructure, community facilities, or economic development/microenterprise projects identified through a local prioritization process. Assistance is coordinated with the department's Resource Team.

Planning-Only Grant

\$ 500,000

Contact: Sheila Lee-Johnston

Provides funds to eligible communities on a funds available basis for a wide range of planning activities that address public health and safety issues; improve essential services to LMI individuals; complete a necessary and specific step within a broader community development strategy; or meet a planning requirement that will principally benefit LMI persons. Grants of up to \$35,000 are available, based on type of project. Multiple jurisdictions may request up to \$50,000.

Imminent Threat Grant

\$ 200,000

Contact: Bill Prentice

Provides funds to address unique emergencies posing a serious and immediate threat to public health and safety on a funds availability basis. Upon formal Declaration of Emergency, costs can be covered for a temporary repair or solution while funding for a permanent fix is secured.

Housing Enhancement Grant

\$ 850,000

Contact: Sharon Robinson

Companion funds to support priority applications submitted to the Washington State Housing Trust Fund.

Housing Rehabilitation Grant

\$ 1,000,000

Contact: Dan Riebli

Funds to support local housing rehabilitation activities. Grants of up to \$500,000 can be awarded annually.

Public Services Grant

\$ 1,543,484

Contact: Kaaren Roe

Grants made available through counties to community action agencies serving nonentitlement areas for activities serving LMI people. Funding provided by formula and administration coordinated with the state Community Services Block Grant Program.

Administrative One Percent Set-aside for Technical Assistance

One percent of the state's annual allocation of CDBG funding is used to provide technical assistance to CDBG eligible jurisdictions.

Business Loan Portfolio

Contact: Dan Riebli

Four types of block grant lending instruments are currently used in Washington to assist business:

- CDBG Float-Funded Activity Program
- Loans from the Rural Washington Loan Fund
- HUD Section 108 Guarantee Loans
- Regional Microenterprise Development Grants

Eligibility Guidelines

- Eligible applicants are Washington State cities and towns with less than 50,000 in population or counties with less than 200,000 in population that are non-entitlement jurisdictions or are not participants in a HUD Urban County Entitlement Consortium.
- Non-profit organizations, Indian tribes, and special purpose organizations such as public housing authorities, port districts, community action agencies, and economic development councils, are not eligible to apply directly to the CDBG Program for funding. However, eligible jurisdictions may choose to serve Indian tribes within their jurisdiction or to involve the other organizations in the operation of projects funded under the program.
- Projects must principally benefit LMI persons. LMI is defined as 80 percent of county median income.
- Applicants may submit one request per fund each program year.

Federal Citizen Participation Requirements for Local Government Applicants to the State CDBG Program

Federal Regulations 24 CFR 570.486 (a)

- (a) Citizen participation requirements of a unit of general local government. Each unit of general local government shall meet the following requirements as required by the state at Sec. 91.115(e) of this title.
 - (1) Provide for and encourage citizen participation, particularly by low and moderate income persons who reside in slum or blighted areas and areas in which CDBG funds are proposed to be used;
 - (2) Ensure that citizens will be given reasonable and timely access to local meetings, information, and records relating to the unit of local government's proposed and actual use of CDBG funds;
 - (3) Furnish citizens information, including but not limited to:
 - (i) The amount of CDBG funds expected to be made available for the current fiscal year (including the grant and anticipated program income);
 - (ii) The range of activities that may be undertaken with the CDBG funds;
 - (iii) The estimated amount of the CDBG funds proposed to be used for activities that will meet the national objective of benefit to low and moderate income persons; and
 - (iv) The proposed CDBG activities likely to result in displacement and the unit of general local government's anti-displacement and relocation plans required under Sec. <u>570.488</u>.
 - (4) Provide technical assistance to groups representative of persons of low and moderate income that request assistance in developing proposals in accordance with the procedures developed by the state. Such assistance need not include providing funds to such groups;
 - (5) Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining citizens' views and responding to proposals and questions. Together the hearings must cover community development and housing needs, development of proposed activities and a review of program performance. The public hearings to cover community development and housing needs must be held before submission of an application to the state. There must be reasonable notice of the hearings and they must be hold at times and locations convenient to potential or actual beneficiaries, with accommodations for the handicapped. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate;
 - (6) Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the unit of general local government's application to the state. *Substantially changed* means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.
 - (7) Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable.

SAMPLE GRIEVANCE PROCEDURE

This grievance procedure is intended to serve as a guide and should be revised to reflect local circumstances and to incorporate any applicable state or local laws.

- 1. Submit complaints in writing to the designated official (such as the city manager, city/county clerk, or county executive) for resolution. A record of the complaints and action taken will be maintained. A decision by the designated official will be rendered within 15 working days.
- 2. If the complaint cannot be resolved to your satisfaction by the designated official,
 - It will be forwarded to a committee appointed by the governing body. This committee's membership, its ground rules or procedures for hearing complaints, and how the committee can be contacted will be available to the public. The committee will be directed to hear such complaints in an objective, public manner, and after adequate public notice. A written decision will be made within 30 working days. Proceedings of the committee will be recorded and maintained.

OR

- The complaint will be heard and discussed by the governing, elected body at an open, public meeting. A written decision will be made within 30 working days. The decision of the governing body is final.
- 3. A record of action taken on each complaint will be maintained as a part of the records or minutes at each level of the grievance process.

Adopted this	day of	, 200
	Signature of Chief Administrative Official	
	Title	
Attest:		
Allesi.		

Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing and Urban Development

OMB Approval No. 2510-0011 (exp. 12/31/2006)

Instructions. (See Public Reporting Statement a	nd Privacy	Act State	ement and detailed instr	uctions on page 2.)	
Applicant/Recipient Information	In	dicate whe	ther this is an Initial Report	or an Update Report	
Applicant/Recipient Name, Address, and Phone (include are	Social Security Number or Employer ID Number:				
3. HUD Program Name		Amount of HUD Assistance Requested/Received			
5. State the name and location (street address, City and State)	of the projec	t or activity:		1	
Part I Threshold Determinations 1. Are you applying for assistance for a specific project or activit terms do not include formula grants, such as public housing of subsidy. (For further information see 24 CFR Sec. 4.3). Yes No	to receive assistance within the , involving the project or activity in 00 during this fiscal year (Oct. 1 - ee 24 CFR Sec. 4.9				
If you answered " No " to either question 1 or 2, Sto However , you must sign the certification at the end			to complete the remain	der of this form.	
Part II Other Government Assistance Provi Such assistance includes, but is not limited to, any grant		•	-		
Department/State/Local Agency Name and Address	Type of As		Amount Requested/Provided	Expected Uses of the Funds	
(Note: Use Additional pages if necessary.)					
 Part III Interested Parties. You must disclose: 1. All developers, contractors, or consultants involved in the approject or activity and 2. any other person who has a financial interest in the project or assistance (whichever is lower). 					
Alphabetical list of all persons with a reportable financial interess in the project or activity (For individuals, give the last name first)		Security No. oyee ID No.	Type of Participation in Project/Activity	Financial Interest in Project/Activity (\$ and %)	
(Note: Use Additional pages if necessary.) Certification Warning: If you knowingly make a false statement on this form United States Code. In addition, any person who knowingly and					
disclosure, is subject to civil money penalty not to exceed \$10,0 I certify that this information is true and complete.	•		Date: (mm/dd/yyyy)		
Signature:	aure:				
X					
**Note: This certification must be signed be chair, county administrator, or city manage	_	ief Admi	inistrative Official (m	nayor, county commissi	

chair, county administrator, or city manager)

Public reporting burden for this collection of information is estimated to average 2.0 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection information unless that collection displays a valid OMB control number.

Privacy Act Statement. Except for Social Security Numbers (SSNs) and Employer Identification Numbers (EINs), the Department of Housing and Urban Development (HUD) is authorized to collect all the information required by this form under section 102 of the Department of Housing and Urban Development Reform Act of 1989, 42 U.S.C. 3531. Disclosure of SSNs and EINs is optional. The SSN or EIN is used as a unique identifier. The information you provide will enable HUD to carry out its responsibilities under Sections 102(b), (c), and (d) of the Department of Housing and Urban Development Reform Act of 1989, Pub. L. 101-235, approved December 15, 1989. These provisions will help ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. They will also help ensure that HUD assistance for a specific housing project under Section 102(d) is not more than is necessary to make the project feasible after taking account of other government assistance. HUD will make available to the public all applicant disclosure reports for five years in the case of applications for competitive assistance, and for generally three years in the case of other applications. Update reports will be made available along with the disclosure reports, but in no case for a period generally less than three years. All reports, both initial reports and update reports, will be made available in accordance with the Freedom of Information Act (5 U.S.C. §552) and HUD's implementing regulations at 24 CFR Part 15. HUD will use the information in evaluating individual assistance applications and in performing internal administrative analyses to assist in the management of specific HUD programs. The information will also be used in making the determination under Section 102(d) whether HUD assistance for a specific housing project is more than is necessary to make the project feasible after taking account of other government assistance. You must provide all the required information. Failure to provide any requir

Note: This form only covers assistance made available by the Department. States and units of general local government that carry out responsibilities under Sections 102(b) and (c) of the Reform Act must develop their own procedures for complying with the Act.

Instructions

Overview.

- A. Coverage. You must complete this report if:
 - (1) You are applying for assistance from HUD for a specific project or activity and you have received, or expect to receive, assistance from HUD in excess of \$200,000 during the during the fiscal year;
 - (2) You are updating a prior report as discussed below; or
 - (3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.
- B. Update reports (filed by "Recipients" of HUD Assistance): General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

Line-by-Line Instructions.

Applicant/Recipient Information.

All applicants for HUD competitive assistance, must complete the information required in blocks 1-5 of form HUD-2880:

- Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
- Entry of the applicant/recipient's SSN or EIN, as appropriate, is optional.
- Applicants enter the HUD program name under which the assistance is being requested.
- 4. Applicants enter the amount of HUD assistance that is being requested. Recipients enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time (such as project-based assistance under section 8 of the United States Housing Act of 1937), the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
- 5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

Part I. Threshold Determinations - Applicants Only

Part I contains information to help the applicant determine whether the remainder of the form must be completed. Recipients filing Update Reports should not complete this Part.

If the answer to *either* questions 1 or 2 is No, the applicant need not complete Parts II and III of the report, but must sign the certification at the end of the form.

Part II. Other Government Assistance and Expected Sources and Uses of Funds.

A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filling update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:

- Enter the name and address, city, State, and zip code of the government agency making the assistance available.
- State the type of other government assistance (e.g., loan, grant, loan insurance).
- Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
- 4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.
- B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds both from HUD and any other source - that have been or are to be, made available for the project or activity. Non-government sources of funds typically include (but are not limited to) foundations and private contributors.

Part III. Interested Parties.

This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information on:

- All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
- any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds \$50,000 or 10 percent of the assistance (whichever is lower).

Note: A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.

- Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
- 2. Entry of the Social Security Number (SSN) or Employee Identification Number (EIN), as appropriate, for each person listed is optional.
- Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).
- 4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

Note that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, and on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional information required.

Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

Notes:

- 1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
- Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
- See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.
- 4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.
- 5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

SECTION 3-F. LOW- AND MODERATE-INCOME REQUIREMENTS



CDBG General Purpose Grant applications must document how the project will principally benefit low- and moderate-income (LMI) persons.

LMI is defined as income up to 80 percent of the median county income by household size. Appendix B lists the 2006 LMI limits for each county, as defined by HUD.

Based on CDBG regulations, there are four categories for LMI benefit:

1. Area benefit activities

Direct benefit activities

- 2. Limited clientele
- 3. LMI Housing
- 4. LMI Job creation or retention

The first and very important step is to clearly determine the boundaries of the proposed service area and the population to be served.

Area Benefit Activities

Area benefit is the most commonly used category for basic activities. It is an activity that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons.

Examples include:

- Water and sewer improvements
- Community centers

Required documentation (instructions and tables available on page 69):

1. Census data - Using HUD's 2000 Census data, document the jurisdiction or the applicable census area is at least 51 percent LMI. Appendix A lists the jurisdictions that meet this criterion. Instructions on receiving HUD's 2000 Census data by census track or block group are on the next page. List the source of census data used and provide associated maps, as instructed.

OR

Income survey - Document that a statistically valid income survey of the service area was conducted after January 2001. Appendix C provides guidance on how to conduct a community income survey. The Income Survey Worksheet must be completed and the survey methodology must be documented, as instructed.

2. Complete the LMI Benefit Table.

How to Access LMI Census Data:

HUD's 2000 Census data by jurisdiction, census tract and block group is available at: http://www.ofm.wa.gov/census2000/default.asp.

For unincorporated communities or service areas, the first step in using this census data is to identify the census tract and block group by reviewing census maps. These maps are available on the Census website: http://www.census.gov, or through your local planning agency. Once the applicable census tract and block group numbers are identified, HUD's census data spreadsheet can be used. The final column (AL) on this spreadsheet lists the LMI percentage.

Since HUD's census data is in a large spreadsheet, you may need to contact the CDBG Program for assistance in identifying the applicable population and low- and moderate-income population data for a specific jurisdiction, census tract or block group.

Note the following special circumstances:

If a proposed project is to benefit an area that extends outside the incorporated jurisdiction and does not coincide sufficiently well with census boundaries, then an income survey of this larger benefit area must be conducted.

If a proposed project is to exclusively benefit a smaller area within the jurisdiction and the project clearly does not benefit the jurisdiction as a whole, then an income survey of this smaller benefit area must be conducted. However, since projects for smaller target areas are generally viewed by the CDBG Program as a benefit to the entire jurisdiction and determined ineligible, it is recommended the proposed project and income survey first be discussed with CDBG staff.

If a jurisdiction does not meet the 51 percent LMI National Objective criteria and desires to target an area or neighborhood that is over 70 percent LMI or is participating under the Empowerment Zone/Enterprise Community (EZ/EC) initiative, they may be able to meet the area benefit requirements under the Community Revitalization Strategy (CRS) process pursuant to 24 CFR 570.483(b)(1)(v) and (e)(5)(i). Contact CDBG staff for additional information and guidance.

Direct Benefit Activities

These activities directly target services to lower income persons or benefit a limited number or specific group of people as long as at least 51 percent of those served are LMI persons (rather than everyone in an area). An activity can provide a direct benefit with the use of CDBG funds in any of the following ways:

Limited Clientele

• Exclusively benefit a clientele who are presumed by HUD to be principally LMI persons. These special groups include:

➤ Abused children ➤ Battered spouses ➤ Illiterate persons

Severely disabled adults(meeting Census' definition)Persons living with the disease AIDS

If an activity is targeting persons belonging to one of the above HUD-defined special groups, it can be presumed, without requiring a survey, that the activity will be providing a 51 percent benefit to LMI persons. A housing or job creation project cannot be qualified as benefiting LMI based on this special group presumed benefit.

Examples include:

- Construction of a facility to assist battered spouses
- Renovation of a senior center

OR

• Information on family size and income is available and shows at least 51 percent of the activity's clientele meet and will continue to meet the LMI income criteria.

Examples include:

- Renovation of a child care facility
- Renovation of a work force training center.

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• Income eligibility requirements limit the activity to LMI persons only.

Example includes:

- Acquisition of a building to serve as a new Head Start Center.

OR

• Be of such nature and location that it may reasonably be concluded that the activity's clientele will primarily be LMI persons.

Example includes:

- Construction of a day care center designed to serve a public housing complex.

OR

LMI Housing

Require information on household income and residency of homeowners (or renters and affordable rent levels, if applicable) to establish eligible LMI households or housing units. For multiple unit housing projects, over half of the units must benefit LMI households.

Examples include:

- Payment of infrastructure improvement assessments for LMI owner-occupied homes. (An area benefit exception.)
- Housing rehabilitation The rehabilitation of single- and multi-family residences occupied by owner or renter LMI households.
- Acquisition The acquisition of property to be used for permanent housing to be occupied principally by owner or renter LMI households.
- Side service connections The construction cost to hook-up and install or rehabilitate the side connections for owner or renter LMI households.

OR

LMI Jobs

Directly result in the creation or retention of jobs, at least 51 percent of which, on a full-time equivalent (FTE) basis, are documented as either *held by* LMI persons or made *available to* LMI persons.

Examples include:

- Construction by the local government or subrecipient of a business incubator.
- Installation of public water and sewer lines to a site to serve a new distribution warehouse.

Required documentation:

- 1. Complete the LMI Benefit Table on page 69.
- 2. Attach a description of the methodology used to establish principal benefit to LMI or the process to determine eligible LMI households or jobs, as instructed in Row I and Row J of the LMI Benefit Table.

Note the following special circumstances:

If a proposed project, such as a community center, is to provide space that will benefit the entire area but also is to provide space that targets lower income or special need clientele, then the LMI Benefit Table must document that either the entire project can qualify as an area benefit project OR that area data and income qualification data can be combined in proportion to the space used to demonstrate the project's overall benefit to low- and moderate-income persons.

If your project is close to the descriptions provided but uncertainty still exists, contact the CDBG Program to discuss your proposal, confirm eligibility and determine specific documentation requirements.

The CDBG General Purpose Grant may not be the most appropriate CDBG fund for your housing or economic development project. It is recommended you contact the CDBG Program Staff to discuss your project and consider other CDBG or non-CDBG funding sources.

INCOME SURVEY WORKSHEET

(See instructions on next page)

NOTE: This Income Survey Worksheet is required only when an income survey is being used to document benefit.

1.	Enter the current estimated total number of households in the service area.	
2.	Enter the total number of households interviewed.	
3.	Enter the total number of low- and moderate-income households interviewed.	
4.	Enter the total number of persons living in the low- and moderate-income households interviewed.	
5.	Enter the total number of households interviewed in which the income was above the low- and moderate-income level.	
6.	Enter the total number of persons living in the households interviewed in which the income was above the low- and moderate-income level.	
7.	Divide Line 4 by Line 3. (This is the average size of low- and moderate-income households interviewed.)	
8.	Divide Line 6 by Line 5. (This is the average size of non low- and moderate-income households interviewed.)	
9.	Divide Line 3 by Line 2. (This is the approximate percentage of households interviewed that have low- and moderate-incomes.)	
10.	Divide Line 5 by Line 2. (This is the percentage of households interviewed that do not have low- and moderate-incomes.)	
11.	Multiply Line 1 by Line 9. (This is the estimate of the total number of low- and moderate-income households in the service area.)	
12.	Multiply Line 1 by Line 10. (This is the estimate of the total number of non-low - and moderate-income households in the service area.)	
13.	Multiply Line 7 by Line 11. (This is the estimate of the total number of low- and moderate-income persons in the service area.)	
14.	Multiply Line 8 by Line 12. (This is the estimate of the total number of non low - and moderate-income persons in the service area.)	
15.	Add Line 13 and Line 14. (This is the estimate of the total number of persons in the service area.)	
16.	Divide Line 13 by Line 15, and multiply the resulting decimal by 100. (This is the approximate percentage of persons in the service area who have low- and moderate-incomes.)	

INCOME SURVEY WORKSHEET INSTRUCTIONS

The Income Survey Worksheet provides a summary of the results from an income survey conducted by the applicant jurisdiction to document the number and percentage of LMI persons and households in a proposed project service area.

To complete the worksheet, follow the instructions provided in each of the numbered sentences on the worksheet. The survey sample size (line 2) must be of adequate size and sufficiently random to provide a statistically valid database, as defined by the Community Survey Guide (Appendix C).

Income surveys must be the most recently conducted since January 2001. See Appendix C for guidance.

NOTE: Jurisdictions seeking funds from U.S. Rural Development (RD) sometimes conduct surveys to determine the median income level. One survey can be conducted to meet both CDBG and RD requirements by simply asking for the <u>actual</u> household income and the number of persons in the household. The sample in Appendix C, Attachment 3, could be easily modified to reflect this change.

When an Income Survey is used: Submit the following documentation of the survey process:

- 1. A sample of the survey tool, tallying the number of responses by household size.
- 2. A written description of the survey process, describing how the universe was defined and efforts to ensure randomness.
- 3. The Income Survey Worksheet (page 67).

LOW- AND MODERATE-INCOME BENEFIT TABLE

(See instructions on next page.)

		Non	n-Housing Activ	ities	Housing Activities					
А		B-1	B-2	B-3	C-1	C-2	C-3	D	E	F
Activi	rity	Total Number of Persons Benefited	Number of LMI Persons Benefited	Benefit Index % for Persons	Total Number of Households Benefited	Number of LMI Households Benefited	Benefit Index % for Households	Total CDBG Dollars Requested	Total Funds to Benefit LMI Persons/ Households	HUD National Objective

G. Total Project Benefit to Low- and Moderate-Income Persons/Households:

Total of Column E \$____ divided by total of Column D \$___ = ___%

H. Average CDBG Investment Per Household Benefited:

Total of Column D \$_____divided by the total households in the service area that will benefit_____ = \$____ per household.

- I. When the benefit in the B-3 or C-3 columns are less than 100 percent, attach a listing of all data sources and a description of methods used to generate data for this table. See the instructions for more detail.
- J. When the benefit in the B-3 or C-3 columns are 100 percent, attach a description of the process to be used to determine LMI eligibility.

LOW- AND MODERATE-INCOME BENEFIT TABLE INSTRUCTIONS

The information contained in this table will be used for the threshold review of low- and moderate-income (LMI) benefit for each activity. To determine the benefit to LMI persons or households, applicants must provide existing documentation, conduct an income survey with an adequate methodology and response rate, or describe the method to be used for establishing income eligibility. If the means for determining benefit is not adequate, the activity to which the benefit applies will be eliminated from consideration or the entire application may not be accepted. At a minimum, 51 percent of the beneficiaries of each activity must have low- or moderate-incomes. Each calculation must be based on reliable and verifiable data. Consult CDBG Program staff if you have questions.

First, determine whether an activity proposed for CDBG funding is a <u>housing</u> or <u>non-housing</u> activity. For more information on eligible housing activities, see the Overview of Eligible and Ineligible Activities on page 19 or contact the CDBG Program. Then follow the specific instructions for <u>housing</u> or <u>non-housing</u> activities below.

Column A: List each project activity <u>including</u> general administration. (Examples are water improvements, acquisition, community facilities, side service connections, etc.)

For Non-Housing Activities

Column B-1: For each non-housing activity, enter the total number of **persons** that will benefit.

When an INCOME SURVEY is used: Refer to line 15 of the Income Survey Worksheet for the number of **persons** that will benefit or use more current population data, if available.

Column B-2: For each non-housing activity, enter the total number of LMI **persons** that will benefit.

When an INCOME SURVEY is used: Refer to line 13 of the Income Survey Worksheet for the number of LMI **persons** that will benefit. **-OR-**

When CENSUS DATA are used: Multiply the number in Column B-1 by the percent in Column B-3.

For 100% direct benefit activities, the number of **persons** in Columns B-1 and B-2 should be the same.

Column B-3: For each non-housing activity, enter the Benefit Index (%) for **persons.**

When an INCOME SURVEY is used: Use the percent in line 16 of the Income Survey Worksheet or calculate the Benefit Index for non-housing activities by dividing the number in Column B-2 by the number in Column B-1. **-OR-**

When CENSUS DATA are used: Refer to Appendix A for a listing of jurisdictions with at least a 51 percent LMI population. If the project service area is an unincorporated jurisdiction, a smaller area within an incorporated jurisdiction or an area that extends beyond the jurisdiction, contact the CDBG Program staff for additional guidance on locating applicable census data. - **OR-**

If an activity or program is targeting persons belonging to one of HUD's special groups listed on page 64, and an income survey of this population has not been conducted, you can use 51 percent

as the Benefit Index (Column B-3), but you must also explain how the activity is targeting the special group (Row I).

Column E: For each non-housing activity, calculate the Total Funds to Benefit LMI **persons**, by multiplying Column B-3 by Column D.

Columns G-J: Follow the instructions for these columns on the following pages.

For Housing Activities

Column C-1: For each housing activity, enter the total number of **housing units** or **households**.

Column C-2: For each housing activity, enter the total number of LMI **housing units for LMI households**. For more information on eligible housing activities, see the Overview of Eligible and Ineligible Activities on page 19.

For multiple unit housing projects, over half of the units must benefit LMI households. Please contact CDBG Program staff for more specific requirements.

For 100% direct benefit activities, the number of households in Column C-1 and C-2 should be the same.

Column C-3: For each housing activity, enter the Benefit Index (%) for **households**.

Calculate the Benefit Index for housing activities by dividing the number in Column C-2 by the number in Column C-1.

When the activity provides a direct benefit to only LMI households, enter 100 percent.

NOTE: To determine the Benefit Index for general administration, use the Benefit Index listed for the activity with the highest dollar amount in Column D (Total CDBG Request).

- Column D: List the total amount of CDBG funds that will be used for each activity.
- Column E: For each housing activity, calculate the Total Funds to Benefit LMI **households**, by multiplying Column C-3 by Column D.
- Column F: For each activity, indicate the number of the national objective it meets. (In most cases, the activity will meet the first national objective.)
 - 1. Principally benefits persons of low- and moderate-income households.
 - 2. Eliminates slums or blight.
 - 3. Meets urgent community development needs that are a threat to public health or safety.
- Row G: To calculate the Total Project Benefit to LMI Persons/Households for the entire project, divide the total of Column E by the total of Column D.

- Row H: To calculate the Average CDBG Investment Per Household Benefited, divide the <u>total</u> of Column D by the total households in the service area that will benefit. This average amount must be less than the maximum limit for the activity (see Maximum Average CDBG Investment Per Household Benefited Requirement, page 12).
- Row I: Attach a listing of all data sources, a description of methods used to generate data and the basis for the activities' principal benefit to LMI persons and/or households. This must be complete to pass threshold review.

When an INCOME SURVEY is used: **Submit the following documentation** of the survey process:

- 1. A sample of the survey tool, tallying the number of responses by household size.
- 2. A written description of the survey process, describing how the universe was defined and efforts to ensure randomness.
- 3. The Income Survey Worksheet (page 67).

When CENSUS DATA is used: List the census tract(s) and provide associated maps.

If a proposed project, such as a community center, is to provide space that will benefit the entire area but also is to provide space that targets lower income or special need clientele, then the LMI Benefit Table must document that either the entire project can qualify as an area benefit project OR that area data and income qualification data can be combined in proportion to the space used to demonstrate the project's overall benefit to LMI persons. A description of the methods used to establish the benefit for each specific activity must be attached to this Table.

Row J: When the benefit listed in Column B-3 or C-3 of this table is 100 percent, describe the process and income levels to be used to establish LMI eligibility. Use attachments as necessary.

SECTION 4

NARRATIVE, BUDGET, AND WORKPLAN

This section provides specific questions and rating criteria that must be addressed in your application's narrative statements. More points will be given to applicants demonstrating measurable and quantifiable information with documentation that supports their claims.

If submitting an economic development application, it is strongly recommended that you contact Dan Riebli, CDBG Program Manager, to obtain additional details.

Dan Riebli, (360) 725-3017 or Danr@cted.wa.gov

All forms are available on our website: http://www.cted.wa.gov/cdbg. If you need an electronic form emailed to you call (360) 725-3019 or cdpsupport@cted.wa.gov.

SECTION 4-A. NARRATIVE INSTRUCTIONS

CDBG General Purpose Grants will be awarded to the projects that attain the highest comparative scores as determined by criteria that is outlined in the following narrative section. In order to receive funding, projects must demonstrate that they meet the following conditions:

- There is a compelling need for public assistance.
- A feasible technical solution to the problem or opportunity being addressed has been identified and agreed to by affected citizens, the local government, and the appropriate regulatory agencies.
- There is a clear and feasible plan for implementing the project and maintaining its operation into the foreseeable future.
- There is credible evidence that the results will be commensurate to the amount of public funds requested.

An applicant must demonstrate that all of these conditions have been met in order to be considered for funding. The best way to satisfy this requirement is to respond to the questions provided within each Narrative Statement: Need, Capacity, Readiness, and Results.

Your application narrative is one of the most critical parts of your CDBG application. Your narrative statements must tell the story of a project well enough to be compared to other General Purpose Grant applications. For this purpose, rating and scoring criteria is set forth and questions have been formulated to help an applicant attain the highest possible score for its proposal.

Responses to the questions provided by applicants will be rated using specific criteria that cover four parts or statements of a project application stating the: need for the project, capacity of the applicant to implement and support the project, readiness to proceed with implementation, and the results if funded. Taken together, these four statements form the basis of any good project – not just a CDBG project.

The application rating criteria are presented at the beginning of each statement or narrative section, followed by a list of questions. The questions relate directly to the criteria and are meant to clarify what specific information is needed in order for an application to be given a score. Inadequate or missing information will result in a lower score.

It is recommended an applicant use the questions as a guide to organize its information. The questions should not require the assistance of a professional grant writer. By working with the questions sequentially, it should be possible for an applicant to tell where its own project is strong (or weak) in terms of its overall development.

All applicants must provide answers to the General Purpose Grant questions within Section 4-B. The applicant's narrative response must include the following forms:

- Completed Budget Forms
- Work Plan
- Operating Budget Form
- Contact List

A maximum of 100 points will be assigned to each complete application. A score of 65 points or greater must be achieved in order to receive a General Purpose Grant. Points will be assigned to each applicant's narrative statement using the rating criteria that immediately precedes each of the four narrative statements. People whose names are provided on the application Contact List may be contacted to verify or provide additional information regarding an application. Experts may also be contacted to assist in the evaluation and rating of applications.

SECTION 4-B. NARRATIVE STATEMENTS

NEED Statement



Your "NEED" statement will be evaluated on a competitive basis against other projects (25 POINTS).

Your project will be compared to others based on:

- The clarity of the need including whether it is substantiated with data and documentation, and the credibility of the documentation.
- A comparison of the relative hardship and the frequency of the identified need.
- Number and economic status of individuals affected by the need, including both the impact on the community at large and the impact on low- and moderate-income persons in particular.
- The level of urgency to address the need including whether it has been ordered as part of a mandated corrective action.
- Estimation of what would happen if nothing were done.

Instructions

Describe the situation, taking care to <u>answer ALL of the questions below</u>. Be as clear as possible and back your statements with data and documentation.

- 1. What is the need/problem? Define the geographic area affected <u>Include a map of the jurisdiction and the service area for the proposed project.</u>
- 2. Who is affected? Tell us the total number of people affected, how they are affected, and how often they are affected. What hardships are people facing as a result of the existing need?
- 3. Are LMI people affected more than non-LMI? If so, how?
- 4. Are there regulatory orders to address this need? If yes:
 - Describe what these orders are and the consequences if they are not addressed.
 - Complete the Contact List. Include the name, phone number, and e-mail address of the appropriate contact from any agency that has issued a compliance order related to your project.
- 5. Is this project a priority for the community? What was the process used to determine community priorities and the choice to select this project?
- 6. Explain what will happen if nothing is done.



Your "CAPACITY" statement will be evaluated on a competitive basis against other projects (25 POINTS).

Your project will be compared to others based on:

- Whether or not the jurisdiction (and subrecipient if applicable) has the organizational/financial capacity and authority to address the need on its own.
- Financial need including whether the community is sufficiently contributing towards the project (given its capacity in terms of revenues, debt capacity, potential user fees, staff resources, leveraged funds, etc.).
- Past efforts and attempts to address the need.
- Capacity of the jurisdiction (or subrecipient) to operate and manage the project into the foreseeable future.

Instructions

Describe the situation taking care to <u>answer ALL of the questions below</u>. Be as clear as possible and back your statements with data and documentation.

- 1. How able is your community to meet this need on its own?
- 2. Describe past efforts to address this need.
- 3. What incremental steps could you take on your own without outside funding?
- 4. What immediate resources do you have at your disposal to contribute to the project (including staff, equipment, revenue)?
- 5. Do you have current unexpended CDBG program income from a prior year? If so, how much and what is it being used for?
- 6. Do you have staff capacity to manage this project? How will you keep the project on track? Explain the organization capacity of the responsible parties needed to implement and maintain your project.
- 7. If there will be a subrecipient:
 - Describe the relationship between the subrecipient and applicant and who will have responsibilities for: grant administration, procurement, oversight, environmental review, labor standards compliance, etc.
 - Attach the subrecipient's last annual audited financial statement (including operating budget).
- 7. How will the community support the on-going operations and maintenance of the project for at least ten years?

READINESS Statement



Your "Readiness" statement will be evaluated on a competitive basis against other projects (25 POINTS).

Your project will be compared to others based on:

- Degree to which the proposed project is consistent with past planning efforts, or if not, the clear reason why.
- Certainty that the project as proposed is technically feasible, cost effective, and the most appropriate alternative.
- Whether or not the necessary relationships between the organizations needed to make the project work in the long-term are clearly established and appropriate.
- Documentation demonstrating strong agreement among all interested and affected parties that the project as proposed is necessary and appropriate.
- Extent to which all necessary financial and non-financial project participants are firmly committed and involved at the point of application.
- Evidence that the time between contract award and the point at which the public benefits will begin is minimal.
- Thoroughness and reasonableness of the Budget Assumptions and Budget Form.
- Completeness of the Work Plan narrative and Work Plan Form

Instructions

Describe the situation, taking care to <u>answer ALL of the questions below</u>. Be as clear as possible and back your statements with data and documentation.

- 1. Is the project identified in your comprehensive plans or other plans? List the plans and indicate whether the project is consistent with the recommendations within the planning documents.
- 2. Describe your proposed project/solution. Include a detailed list of all essential components.
- 3. What other technical options have been considered to address the need? Why is your proposed technical option the best?
- 4. If relevant, are regulatory agencies in agreement that the proposed solution is the right solution? Provide letters of agreement if available.
- 5. If site acquisition is part of the overall project, document that you have site control, such as with a sales and purchase agreement. If there is no site control, describe how and when a site will be secured.

- 6. What funding source options or project-phasing options have been considered? Why is your proposed financing option the best? List the funding sources that are committed. If not yet committed, when will you apply and when will funding decisions be made? Provide documentation of funds already committed.
- 7. Is the project ready to proceed? If not, what else must be done?
- 8. Complete the Budget Forms. In the Budget Narrative, provide assumptions supporting your numbers.
- 9. Complete the Work Plan Form. The Work Plan narrative should clarify the listed actions and provide additional details. At what point are you now?
- 10. Complete the Contact List. Include the name, phone number and e-mail address of the appropriate contact for each of the funding sources and/or project partners that you have submitted an application to or received a funding commitment from.

RESULTS Statement



Your "Results" statement will be evaluated on a competitive basis against other projects (25 POINTS).

Your project will be compared to others based on:

- Degree of certainty that the project will have the desired impact and will address the need in the way and to the level it was intended.
- Benefit of the project to persons and households that are both above and below the LMI level within the intended service area.
- Methods that will be used to measure results and how this information will be used and reported.
- Return on Investment Degree of certainty that the project will produce outputs¹ and outcomes² that are commensurate with the amount of public resources provided and secured.

Instructions

Describe the project outputs and outcomes taking care to answer <u>ALL of the questions</u> below. Be as clear as possible and back your statements with data and documentation.

- 1. To what extent does the project address the specific needs identified in your "Need Statement"?
- 2. **How many** people will benefit? How many households will benefit?
- 3. How will this project make a **difference** in people's lives?
- 4. What is the impact on rates, if applicable?
- 5. If funded, what performance measures will you use to evaluate project success?
- 6. Explain how the project's expected outcomes and outputs are commensurate with the amount of CDBG funds being requested.
- 7. IF THIS IS A COMMUNITY FACILITY PROJECT (e.g. community center, senior center, health center, etc.) provide a "before and after" outlook of your current facilities, services and occupants and how this will change as a result of the project. Specify if new services and occupants are confirmed and include letters of commitment if available.

¹ <u>Outputs</u> =Things that you can count (quantity). For example, the number of people to be served by a project.

² <u>Outcomes</u> = How people will benefit from the project (quality). For example, what difference will the project make in an individual's life?

SECTION 4-C. CDBG BUDGET FORMS AND INSTRUCTIONS

This part of the General Application Instructions, Requirements, and Forms provides guidance for completing the CDBG Budget components:

- 1) CDBG Budget Assumptions
- 2) CDBG Project Budget Form
- 3) Operations Budget Form

All applicants **must** complete budget components 1 and 2. Component 3 must be completed for proposals containing public facility, public services, or community facility activities.

COMPONENT 1. THE BUDGET ASSUMPTIONS INSTRUCTIONS

The assumptions provide a description of how the budget was determined. It should include an explanation and a cost estimate <u>for each line</u> of the CDBG Project Budget Form, and the Operations Budget Form, if applicable. The budget assumptions provide detail for each source of funds, the corresponding dollar amount, and explain how the different sources will be utilized.

The assumptions should include the following:

- Explanation of why the budget is reasonable and appropriate, considering the scope, substance, and duration of the proposed project.
- State the assumptions that support line item calculations; be detailed and specific.
- Provide a brief description of any proposed purchase of equipment that would cost over \$300.

When addressing projects that include public facility or community facility activities, the budget assumptions should explain budget projections with source of facts, explain how the applicant will continue operating the facility, and provide services after the project is completed.

(This application package does not contain a sample budget assumptions format.)

APPLICANTS MUST PROVIDE THOROUGH BUDGET ASSUMPTIONS FOR EACH LINE ITEM.

SUBMIT THIS FORM WITH APPLICATION

COMPONENT 2: CDBG PROJECT BUDGET					
Funding Status	Source 1	Source 2	Source 3	Total	
T thing status	CDBG				
Are the sources committed?	☐Yes ☐ No	☐Yes ☐ No	☐Yes ☐ No	☐Yes ☐ No	
If not, date when commitment expected.					
Budget Elements					
General Administration (CDBG contract execution, files and record keeping, civil rights compliance)					
Project Administration (Project Manager, Consultant Fees)					
Environmental Review					
Architectural Fees					
Engineering Fees					
Acquisition/ Relocation					
Architectural Barrier Removal					
Housing Activities					
Water/sewer side connections					
Sewer Improvements					
Water Improvements					
Street Improvements					
Fire Protection					
Community Facilities					
Commercial/Industrial Facilities					
Revolving Loan Fund Program					
Public Services					
Planning					
Other:					
Total					

(Use a second copy of form if more than 3 funding sources)

COMPONENT 2: CDBG PROJECT BUDGET FORM INSTRUCTIONS

The CDBG Project Budget form is used to provide the <u>total</u> budget of the proposed CDBG project, and is divided between activity costs (such as General Administration, project administration, public facilities construction, or housing rehabilitation).

When determining costs for the Project Budget form, applicants should indicate only the level of funding needed to carry out the project. The grant request must be sufficient either by itself or included with other proposed funding sources to assure effective administration and completion of the proposed project within the contract period.

When completing the Project Budget form, list CDBG costs in the Source 1 column and estimated costs associated with other sources (as well as the name of the other source) in the Source 2 and Source 3 columns, as needed.

<u>Funding Status-</u> For each funding source, use first two lines in the corresponding column to indicate whether there is a firm funding commitment or, if not, when a firm commitment is expected.

<u>General Administration</u>- Grantees should carefully complete this line item. In addition to identifying administrative expenditures, it will serve as a guide for preparing the contract and for project monitoring in the event the proposal is funded. General Administration is distinct from <u>Project Administration</u>, which is defined on the next page.

If applying for CDBG administrative funds, applicants should keep in mind that grant recipients are expected to stay within this budget; administrative costs are not normally changed during the life of the project.

Eligible General Administration activities include:

- Review and execution of the CDBG contract
- Establishment of CDBG files and record keeping
- Compliance with civil rights activities including fair housing activities, Section 504, ADA, and Title VI
- Contract close-out activities

The General Administration line item does not include the administrative costs for project activities such as housing, economic development, community facilities, or public facilities. General Administration does not include any costs associated with the preparation of a CDBG application. *The application preparation costs are ineligible under CDBG guidelines.* Please contact CDBG Program staff if you have questions concerning administration costs.

All applicants must complete the administrative line item whether they are requesting CDBG funds for administration or not. General Administration costs can be covered through local or in-kind contributions.

Items to include when computing the General Administration line item include:

<u>Personal Services</u> - Compute all salaries, wages, and fringe benefits to be paid for General Administration of the grant.

<u>Office Costs</u> - Compute the costs of supplies. Include postage costs, telephones, equipment leasing costs, printing and publication costs, and office costs. Publishing fair housing resolutions can also be costly and should be considered when preparing the budget.

<u>Professional Services</u> - Compute consultant costs, legal costs, and audits costs. Generally, engineering and other technical services should be entered under engineering and other technical services line items.

<u>Other</u> - Applicants should take into consideration any other administrative costs or expenses that may be incurred prior to administrative closeout.

Enter total costs calculated for General Administration and enter under the General Administration line item.

<u>Project Administration</u> - Enter all costs which are directly related to project implementation and carrying out the CDBG project.

Eligible project administration activities include, but are not limited to:

- Conducting environmental reviews and preparing environmental review documents
- Attending grant management training workshops
- Processing payment vouchers
- Ensuring labor standards compliance
- The costs of processing applications for direct benefit projects and conducting inspections

Architectural Fees - Enter all costs associated with the use of an architectural firm.

Engineering Fees - Enter the total engineering costs associated with the project.

<u>Acquisition</u> - Enter total purchase price and include the appraisal costs in addition to any closing costs associated with the acquisition of property. Explain all costs listed in the budget assumptions.

Relocation - List all costs associated with relocation. If you are unsure if relocation is applicable, contact the CDBG Program staff.

<u>Architectural Barrier Removal</u> - Enter costs associated with removing architectural barriers to bring facilities into compliance with the Americans with Disabilities Act.

<u>Housing Activities</u> - Enter all costs associated with housing activities. If there are administrative, planning, architectural, or engineering costs directly associated with a specific listed housing activity, include those costs on the appropriate line item. Explain all housing activity costs in the budget assumptions.

<u>Water/Sewer Side Connections</u> - Enter costs associated with the replacement or construction of water or side service connections. This includes all work done on private property. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item.

<u>Sewer Improvements</u> - Include all costs associated with construction or rehabilitation of the sewer system. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item.

<u>Water Improvements</u> - Enter costs associated with construction or rehabilitation of the water system. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item.

<u>Street Improvements</u> - Enter costs associated with construction or rehabilitation of streets. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item.

<u>Fire Protection</u> - List all costs associated with fire protection such as fire protection equipment or fire protection vehicles. Explain all fire protection activity costs in the budget assumptions.

<u>Community Facilities</u> - Enter all costs associated with community facilities activities if the project category of the application is community facilities or includes community facilities activities as part of a comprehensive application. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item. Explain all community facilities activity costs in the budget assumptions.

<u>Commercial/Industrial Facilities</u> - Enter all costs associated with commercial or industrial activities if the project category includes economic development activities as part of a comprehensive application. If there are administrative, planning, architectural, or engineering costs directly associated with a specific activity, include those costs on the appropriate line item. Explain all economic development activity costs in the budget assumptions.

Revolving Loan Fund Programs - List costs associated with setting up or retaining a revolving loan fund program. Explain all costs in the Budget Assumptions.

<u>Public Services</u> - Enter total public services costs. This refers to direct costs (including personnel, supplies, and travel) associated with the provisions of public services eligible under the CDBG Program.

Note: Not more than 15 percent of the total request may be used for public services unless approved by the CDBG Program.

Planning - Enter total planning costs. This refers to proposed planning costs directly related to the overall project proposal, and is not related to the CDBG Planning-Only Grant that has its own application cycle. The combined General Administration costs and planning costs may not exceed 15 percent of the total funding request.

<u>Other</u> - List costs associated with any other activity not listed above, such as clearance, flood control or drainage activities, or parking. Explain all activities in the budget assumptions.

Note: For Comprehensive Projects - Use line items that reflect activities included in the proposal.

<u>Total Project Budget -</u> Enter total for each source and a grant total on the line provided. These totals should match those amounts listed on the Project Summary form.

COMPONENT 3: OPERATIONS BUDGET FORM					
Budget Year beginning date:					
REVENUES	1ST YEAR	2ND YEAR	3RD YEAR	4TH YEAR	5TH YEAR
1. User Fees					
a.					
b.					
2. Grants					
a.					
b.					
3. Municipal Budget Allocation					
4. Other Revenue Sources					
a.					
b.					
Total Annual Revenues					
OPERATING EXPENSES					
1. Salary, Wages, Benefits					
2. Insurance					
3. Utilities					
4. Operating Reserve					
5. Travel/Training					
6. Office Equipment/Supplies					
7. Marketing and Advertising					
8. Loan Repayments					
9. Repairs					
10. Services - Contracts					
11. Maintenance Supplies					
12. Replacement Reserve					
13. Other Expenses (specify)					
a.					
b.					
Total Annual Operating Expenses					

COMPONENT 3: OPERATIONS BUDGET FORM INSTRUCTIONS

An Operations Budget form is required for each community facility and public facility proposal and any other facilities-based project that will continue operating after CDBG funding is completed. The Operations Budget form consists of a summary of projected annual revenues and operating expenses for a five-year period following completion of the project.

<u>Budget Year-</u> Enter the beginning and ending dates of the Budget Year in the spaces provided. Start the budget year after project completion.

Instructions for the Operations Budget Form are as follows:

<u>Revenues</u>- Under Line 1, enter expected annual revenues from user fees, by type of user fee.

Under Line 2, enter expected annual grant amounts, by specific grant source.

Under Line 3, enter anticipated budget allocations from local units of government, by jurisdiction.

Under Line 4, detail Other Revenue Sources in the spaces provided.

Enter Total Annual Revenues.

<u>Expenses</u>- Under Line 1 through 12, enter the amounts of all expenses and contingency funds for items listed. Under Line 13, detail Other Expenses in the spaces provided.

Enter Total Annual Operating Expenses.

Total Annual Revenues should meet or exceed Total Annual Operating Expenses. If Total Annual Operating Expenses exceed expected Total Annual Revenues, <u>describe in the budget assumptions how the facility will maintain operation.</u>

Note: Explain each line item on the Operations Budget Form in the budget assumptions.

SECTION 4-D. PROJECT WORK PLAN

The Work Plan form should be supported with a Work Plan narrative to clarify the listed actions and provide additional details.

ACTIONS	DATES (FROM – TO)	RESPONSIBLE PARTY

-- SAMPLE --TOWN OF COZY COVE GENERAL PURPOSE GRANT APPLICATION

The Work Plan form should be supported with a Work Plan narrative to clarify the listed actions and provide additional details.

ACTIONS	DATES (FROM - TO)	RESPONSIBLE PARTY
PROJECT START UP		
Attend grant management workshop	04/15/2005	Consultant
Select administrative personnel		Mayor
Establish files/admin. procedures	04/19/2005	Mayor
Negotiate contract with CTED	05/15/2005	Clerk/Consultant
Begin environmental review		Consultant
Environmental release of funds		CTED
PROJECT DESIGN		
Issue notice to proceed to engineer	08/03/2005	Council
Commence design	08/10/2005	Engineer
Complete project design	10/02/2005	Engineer
Approval of design by regulatory agency(ies)	11/30/2005	DOH
Prepare bid documents	01/01/2006	Engineer
ADVERTISE FOR CONSTRUCTION BID		
Review contract requirements	01/01/2006	Engineer & Town
Publish bid advertisement		Clerk & Engineer
Open bids and examine proposals		Clerk
Request construction debarment review	11/27/2006	Engineer
Select contractor and award bid	12/04/2006	Council
Conduct pre-construction conference		Engineer & Town
Issue notice to proceed		Mayor
Submit drawdowns and progress reports	Ongoing	Clerk
PROJECT CONSTRUCTION		
Begin construction		Contractor
Monitor engineer and contractor		Mayor & Council
Conduct labor compliance reviews		Engineer
Hold construction progress meetings		Engineer
Final Inspection		Engineer
Submit drawdowns and progress report	Ongoing	Clerk
PROJECT CLOSEOUT		
Conduct final public hearing		Council
Submit final drawdown		Clerk
Complete close-out performance report	11/15/2007	Engineer & Mayor
Submit final certification – OR		
Submit conditional certifications		Engineer
Include project in audit	11/30/2007	Clerk

SECTION 4-E CONTACT LIST FOR FUNDING RESOURCES, PARTNERS, AND INTERESTED PARTIES

PROGRAM	CONTACT PERSON	PHONE # AND E-MAIL

SECTION 5

APPENDICES

Appendix A: Jurisdictions with 51% or Greater LMI Population

Appendix B: 2006 Income Limits

Appendix C: Community Survey Guide

Appendix D: Federal and State Regulations

Appendix E: Public Hearing Handouts (Spanish Version)

JURISDICTIONS WITH 51 PERCENT OR GREATER LMI POPULATION

(Based On HUD's 2000 Census Data)

NAME	LMI	TOTAL	LMI
	Population	Population	Percentage
Almira	173	321	53.9
Benton City		2,533	52.0
Bingen	435	652	66.7
Brewster	1,520	2,125	71.5
Bridgeport	1,453	2,099	69.2
Bucoda	404	648	62.3
Chelan	1,923	3,532	54.4
Chewelah	1,155	2,129	54.3
Clarkston	3,894	7,067	55.1
Cle Elum	922	1,787	51.6
Conconully	124	209	59.3
Concrete	497	832	59.7
Connell	1,375	2,403	57.2
Coupeville	875	1,610	54.3
Creston	121	230	52.6
Cusick	150	211	71.1
Ellensburg	8,027	13,234	60.7
Entiat	502	959	52.3
Everson	1,059	2,043	51.8
George	368	510	72.2
Goldendale	1,996	3,665	54.5
Grand Coulee	506	878	57.6
Granger	1,811	2,586	70.0
Hamilton	194	330	58.8
Hartline	79	142	55.6
Hatton	65	118	55.1
Hoquiam	4,724		52.6
Ione	302	506	59.7
Kahlotus	143	257	55.6
Kelso	6,133	11,730	52.3
Kettle Falls	838		54.0
Kittitas		•	
Krupp			
Lamont			
Long Beach			
Mabton	1,279	1,911	66.9
Malden	139	213	65.3
Mattawa	2,029	2,703	75.1

JURISDICTIONS WITH 51 PERCENT OR GREATER LMI POPULATION

NAME	LMI Population	TOTAL Population	LMI Percentage
Mesa	269		61.0
	118		
	118		
	253		
	107		
Northport	212	343	61.8
Oak Harbor	12,622	19,797	63.8
Oakville	346	640	54.1
Okanogan		2,281	54.4
Omak	2,482	4,461	55.6
Oroville	1,005	1,630	61.7
Othello	3,172	5,700	55.6
Pe Ell	391	688	56.8
Pullman	11,621	19,792	58.7
Quincy	2,951	5,116	57.7
Raymond	1,516	2,754	55.0
Republic	558	978	57.1
Riverside	217	349	62.2
Rock Island	467	883	52.9
Royal City	1,133		61.6
Sequim	2,109	4,086	51.6
Soap Lake	1,082	1,695	63.8
South Bend	963		53.2
Springdale	202	316	63.9
Starbuck	85	115	73.9
Sumas	572	965	59.3
Sunnyside	8,704	13,869	62.8
Tenino	829		57.3
Tieton	590	1,131	52.2
Toledo	312	612	51.0
Tonasket	557	880	63.3
Toppenish	5,799	8,781	66.0
Union Gap	2,806	5,479	51.2
Wapato	3,182	4,575	69.6
Warden	1,462	2,540	57.6
Wilson Creek	147	201	73.1
Winthrop	177		54.6
Yelm			51.3

COMMUNITY SURVEY GUIDE

A Step-By-Step Survey Process For Determining Income Levels And Assessing Needs Of Low- And Moderate-Income Persons

Introduction

This guide outlines a step-by-step survey process for determining income levels and assessing the needs of low- and moderate-income (LMI) persons. It is to be used by local officials, staff, and volunteers working for jurisdictions that are eligible to apply for funding through the Community Development Block Grant (CDBG) Program. It contains instructions necessary for a jurisdiction to develop, administer, and document a statistically valid income survey and to determine whether a service area or target population will meet CDBG Program requirements related to LMI benefits. It also contains instructions for conducting a community needs survey, as a separate process or in tandem with an income survey.

An income survey is required of any applicant submitting a project proposal that provides area benefit, unless US Department of Housing and Urban Development (HUD)'s 2000 Census data already show the service area consists of over 51 percent LMI persons. The survey determines the percentage of LMI persons in the community. The minimum percentage of LMI benefit required of an area benefit project is 51 percent.

An income survey conducted since January 2001 may be used to meet this requirement if the applicant can demonstrate that the survey results are still current and representative of the community. This may be accomplished by documenting that population size, demographics, unemployment rate, and employment has remained nearly the same since the survey. Sources of documentation include: hospitals, realtors, local employers, the Office of Financial Management, and/or the Department of Employment Security.

A community proposing a project that will provide direct benefits to persons or households who are individually qualified on the basis of income prior to receiving the service is not required to conduct an income survey. Instead, the benefit requirement of the program is met by the type of activities and services proposed and the commitment on the part of the applicant to screen beneficiaries for income eligibility prior to delivering the service.

The CDBG Program places emphasis on the identification and prioritization of the community development needs of LMI persons. In some cases, an applicant may choose to conduct a combined income and community needs survey to simultaneously demonstrate LMI priority needs and the percent benefit that would be achieved if activities were proposed in the CDBG application to address them.

Definitions

The following definitions explain terms that are used throughout this survey guidebook:

A. Low- and Moderate-Income (LMI) Persons

For the purposes of evaluating and rating CDBG applications, a "LMI person" is defined as one whose income is no more than 80 percent of the median family income for the county. Refer to Appendix B: 2006 Income Limits.

B. Area Benefit Project

Benefits provided to LMI persons by a CDBG project may be either area or direct. Area benefit activities meet the identified needs of all households within a clearly defined service area or jurisdiction, and at least 51 percent of the persons meet the LMI criteria. Development of a park or construction of a municipal sewage treatment plant to benefit a community or neighborhood with a high percentage of LMI persons are examples of projects that provide area benefits. Any applicant submitting a project proposal that provides area benefit may either use HUD's Census data or conduct an income survey.

C. Direct Benefit Project

Direct benefit activities clearly focus on benefiting LMI persons or members of eligible special groups rather than all residents of a particular area. A housing rehabilitation project providing loans to LMI homeowners, or a daycare facility that serves principally LMI families are examples of direct benefit activities.

D. Universe

The universe is the total number of people/households within the entire benefit area that is to be served by the project or activity. A portion of the entire benefit area with a heavy concentration of LMI households cannot be singled out as a target area.

E. Sample Group

A sample group is a number of households that have been randomly selected from a universe. Random selection of an adequate-sized sample group ensures that it is representative of the universe from which it has been drawn. Estimates are made about the universe from the sample group. By asking carefully framed questions and interpreting them correctly from an adequate-sized randomly drawn sample, surveyors can be assured that the overall estimates have a reasonable degree of accuracy. For instance, assume that the universe is a community containing about 400 homes. By sampling a portion of the 400 households residing within that community, estimates may be made about the incomes or needs of all residents of the 400 households.

F. Total Household Income

Total Household Income is all gross wages, tips, and salaries earned by all members of the household in the previous 12 months.

Step One: Appoint Survey Coordinator

The first step of a survey process is to recognize that a survey will typically take planning, coordination, and effort over a period ranging from several days to several months depending on the goals of the survey process and the size of the population or target area to be surveyed. To ensure that the effort yields statistically valid results, it is recommended that a survey coordinator be appointed to lead the process and provide oversight through all steps, from beginning to end. An applicant community has several options available for selecting and appointing a survey coordinator. It may be possible to use an existing member of the jurisdiction's administrative, planning, community development, or public works department staff. It may also be possible to recruit a volunteer to serve as the coordinator. In some cases, a community may choose to hire a consultant to oversee and conduct the survey process, although the steps outlined in this guidebook are designed for people who have no prior survey expertise. Many communities have used resources available to them through local community colleges and universities. Some instructors and professors will take on a community survey as part of their planning or social services curriculum. What is important at this stage is: to obtain a commitment from the person selected to see the process through; to be clear about expectations of the job; and to establish effective communication channels with local elected officials.

Step Two: Define Survey Universe

Step two of the survey process is designed to yield a definition of the survey universe. Completion of this step is dependent on identifying: the goal or goals of the survey; the physical boundaries of the geographic area to be surveyed or the characteristics of the total population to be surveyed; and the households that exist within the defined geographic area or meet the demographic characteristics of the target population.

A. Identify goals of the survey process.

Each applicant must choose from among at least three possible survey goals that are:

1) To determine incomes of a community, service area, or target population, 2) to determine community development and housing needs of a community, or 3) to determine incomes and needs of a community.

If the goal is to determine incomes of a community, service area, or target population, the process will unfold as an income survey. This is an appropriate choice if the community has already defined the needs of the community and its LMI population and is attempting to demonstrate the area benefit of the priority activities it intends to propose as part of the CDBG application.

If the goal is to determine community development and housing needs, the process will unfold as a need survey. This is an appropriate choice if the applicant is prepared to conduct a second survey should the needs survey identify area benefit activities as the priorities for a CDBG application. In this case, it is generally assumed that priority needs and service areas have not yet been identified. In some cases, it is also an appropriate choice if the community anticipates that the survey will demonstrate the need for a direct benefit project proposal, which does not require an income survey.

If the goal of the survey is to assess the housing and community development needs of the community while at the same time determining incomes of residents community-wide, a combined income and needs survey process will be necessary. This is an appropriate choice if priority needs are not known and the community intends to conduct only one survey. To accomplish a combined survey, care must be taken to build in neighborhood designations or other indicators of demographic characteristics that can be used to define the service area or target population prioritized activities will ultimately benefit. Colorcoding surveys from designated neighborhoods is one method to distinguish survey results.

B. Identify geographic boundaries or population characteristics of the survey universe.

The geographic boundaries or populations that define the survey universe will vary depending on the goals of the survey process. When priority needs and activities have been identified and an income survey is planned to determine area benefit, the proposed activities determine the geographic area or characteristics of the population that should be included in the survey universe. For example, if the priority activity is a senior center, it follows that the survey universe should include all residents of the community who are senior citizens (age 62 or older.) If the priority need is water system improvements that will exclusively benefit a specific neighborhood, then the survey universe should include the entire geographic area of the neighborhood. If the priority need is a sewer system that will benefit the entire jurisdiction, then the geographic boundaries of the survey universe should include the entire jurisdiction. In this case, the survey universe must conform to geographic boundaries of the service area, or the unique characteristics of the population that will receive services.

When the goal of the survey is to determine needs, the survey universe should correspond to the geographic boundaries of the jurisdiction.

When the goal of the survey is to simultaneously determine needs and incomes communitywide, the survey universe must correspond with the geographic boundaries of the jurisdiction.

C. Identify households within the survey universe.

To complete the process of defining the survey universe, all households in the community, service area, or target population must be identified. A method for identifying the households in a universe must be developed in order to draw a sample group. Ideally, a list of each person living in a universe and their telephone number is available. If a list is available, devise a procedure to randomly select households to be interviewed. If a list is not available, the following resources may be useful for identifying all households in the survey universe:

- 1. City indexes, if available and up-to-date, usually provide the best source of household information suitable for selecting samples.
- 2. Reverse directories are potential sources for obtaining sampling information. They help to eliminate households that are located outside a service area.

- 3. Telephone books are also a potential source for obtaining sampling information. However, people without telephones or those who have unlisted numbers would be excluded from a sample, unless additional tools are used.
- 4. Tax rolls are another potential source of addresses. The limitation of tax rolls is that they identify only property owners, not the residents. Since property owners and residents may not be the same, additional research will be necessary. Also, tax rolls identify only building addresses, not specific household addresses. For instance, apartment buildings will be listed by address while individual apartments within the building need to be identified for sampling purposes. Tax rolls identify locations for interviews, but cannot be used as the basis of a mail or telephone survey unless a reverse directory is used.
- 5. Consideration must be given to multiple unit residences, such as apartment buildings, which may have only one billing address but represent several households to be surveyed.

If the survey universe is smaller than the entire jurisdiction, then the service area households or target population households will need to be extracted from the above sources based on addresses. If the survey universe is a target population, it is also often possible to involve other service providers in identifying the number and location of households. In some cases, if the survey universe is a target neighborhood, it is possible to actually walk through the neighborhood and inventory all households.

When planning a combined income and needs survey, it is important to identify households by neighborhood.

Step Three: Select Survey Sample From The Households Within The Universe

Once the survey universe has been defined, the next step is to select a survey sample of households within the survey universe. To complete this step, it is necessary to: determine the appropriate sample size; establish a process to replace unreachable and other non-response households; and draw the survey sample.

A. Determine sample group size needed to generate the minimum number of required responses.

After all households have been identified, the next step is to determine the sample group size needed to generate the minimum number of responses required for a CDBG income survey. If a jurisdiction does not obtain the minimum number of responses, the activity for which the benefit is claimed will be eliminated, or the entire application may not pass threshold review and will not be accepted for rating and selection.

To help determine sample group size, use Table A, "Required Sample Sizes For Universes of Various Sizes." Listed in Column A are the universe sizes. Listed in Column B are the sample group sizes or the minimum number of needed responses. A hypothetical 400

household neighborhood is used to illustrate the use of this table. Under "Number of Households in the Universe," locate line 399 to 650 households. The number of complete responses required in the sample is 250. (See Attachment 1, Discussion of Sample Size, page 120, for an explanation of how these samples were determined.)

TABLE ARequired Sample Group Sizes For Universes of Various Sizes

Column A	Column B
Number of Households in	Sample Group Size Needed to Complete
the universe	Responses Required
1-49	1-49 (100%)
50-55	50
56-63	55
64-70	60
71-77	65
78-87	70
88-99	80
100-115	90
116-133	100
134-153	110
154-180	125
181-238	150
239-308	175
309-398	200
399-650	250
651-1,200	300
1,201-2,700	350
2,701 or more	400

B. Establish a process to replace unreachable and other non-response households within the sample.

The sample group sizes listed in Table A indicate the number of interviews that must be completed, not necessarily the number of households that will need to be contacted. They are distinctly different and rarely are they the same number. No matter what is attempted, some households will not be home during the periods set aside for interviewing, some will refuse to be interviewed, some will terminate the interview before it is completed, and some will complete the interview but fail to provide an answer to the key question on income level. To be considered a completed interview for CDBG purposes, the interview must include complete and accurate information on the respondent's income level.

Table B indicates the usual rates of response that can be expected from a variety of survey instruments. For example, when conducting a door-to-door survey in a 400-household neighborhood, a sample of 278 to 333 households (250 divided by .90 or .75) should be drawn to obtain 250 completed interviews. Over-sampling is one way to deal with unreachable households and other non-response situations.

TABLE B

Expected Response Rates For Different Types of Surveys

Expected Survey Type	Rate of Response
Mail	25 - 50%
Mail, with letter follow-up	50 - 60%
Mail, with telephone follow-up	50 - 80%
Telephone	75 - 90%
Door-to-Door	75 - 90%

C. Draw Samples.

To acquire a good sample of the universe, everyone in the universe needs to have an equal chance of being included in the sample. To ensure an equal chance, a random sample may be drawn using a random numbers table. (See Attachment 2, Instructions For Using A Random Numbers Table and the Random Numbers Table, page 121.) A random numbers table is a computer-generated list of random numbers that can be used in a variety of ways. When using a random numbers table, a sample is drawn from the universe using the numbers appearing on the table. If, for example, the first three random numbers from the table are 087, 384, and 102, the 87th, 384th, and 102nd households from the universe listing will be included in the sample to interview. Continue until the desired sample size is achieved.

As indicated above, it is advisable to over-sample. When unreachable households and other non-response situations are encountered, they may be replaced with households in the over-sample list in the order replacements were selected. For example, if a list of 300 households is drawn in an effort to obtain 250 interviews, the first household written off as "unreachable" should be replaced by the 251st household in the sample.

If a listing is unavailable of all the households in a service area, but the geographic boundaries can be defined, a starting location may be randomly selected and the selection process may proceed systematically from there. For example, in referring back to the hypothetical 400 household neighborhood needing a sample group of 250 households, every 1.6th household (400 divided by 250) should be interviewed to ensure that the entire neighborhood has been sampled. In whole numbers, this works out to about 2 of every 3 households. Therefore, the interviewer can start at one end of the neighborhood and proceed systematically through the entire neighborhood interviewing two households and then skip one. If an interview is not possible, the next household that would have been skipped should be interviewed. Therefore, when the sample group size calls for one of every six households to be sampled, a random number from one to six can be drawn, with the interviewer starting at that household seeking interviews at every sixth household. Unreachables can be replaced with every third household in the six household groups. Statistically valid results will be obtained if households are not too quickly written off as unreachable. Randomness is most certain if interviews are conducted from the households first selected. Thus, if a door-to-door survey is being conducted, two or more passes through the area (at different times) should be attempted.

Frequently respondents will be busy, but will say that they can do the interview later. An appointment should be made to return and complete the interview. Only after at least two tries or an outright refusal should a sampled household be replaced. With a telephone survey, attempt three calls before replacing a household.

Step Four: Select Survey Method

Those conducting the survey should decide which survey method or combination of survey methods is best for the community, considering the number of people available to assist, the size of the sample needed, and the means available for identifying households to interview.

- **A.** A telephone survey is relatively easy to conduct. The interviewer places a telephone call to a previously determined household, introduces himself, identifies the head of the household or a knowledgeable person, proceeds with the interview, and accurately records the answers. However, the steps that must be taken before making telephone calls may prove difficult. In a telephone survey, the telephone numbers of all the households in the service area must be obtained, <u>and</u> a method for contacting households without telephones or those with unlisted numbers must be devised. A reverse directory, listing telephone numbers by addresses, is helpful especially if a sample of the total population is used or survey boundaries are defined.
- **B.** A door-to-door survey takes more time to conduct because of the "leg work" needed to obtain interviews. First, the interviewer should introduce himself, then make contact with someone who is qualified to speak for the household (i.e., head of household, spouse of the head of household, or someone in the household who is mature and knowledgeable about household income.) Next, the interviewer identifies the purpose of the survey, solicits participation from the respondent, and accurately records the answers.

Small communities often use a door-to-door survey because the service area is easily defined. By developing procedures for sampling within the service area, a list of all households within the service area is not needed beforehand.

- C. A mail survey may be the easiest to conduct, but often yields a low rate of response, which means a low degree of accuracy. To conduct a mail survey, the community needs a list of all the addresses in the service area; a questionnaire; stamped, self-addressed return envelope; and postage. Also, provisions must be made to provide non English-speaking residents with a questionnaire in their own language. Consideration must be given to multiple unit residences, such as apartment buildings, which may have only one billing address but represent several households to be surveyed. With mail surveys, at least one follow-up letter or telephone call may be needed to produce the required number of responses.
- **D.** A combination survey may be advisable in some situations. For example, when no one is home to answer a door-to-door survey, a note may be left requesting that the occupants telephone the interviewer. Similarly, the interviewer may telephone a household to schedule an interview time. A letter may be mailed to residents of the target area informing them of the date a survey will occur and a time an interviewer(s) will be in the area.

Step Five: Develop Survey Questionnaire

Consistent and accurate responses are more likely to be obtained when questionnaires include a standard introduction explaining the purpose of the survey and ensuring that the respondents' answers will be kept confidential. A procedure to maintain this confidentiality needs to be established. If the respondent's name, address, and telephone number appear only on a cover sheet, it can be thrown away or separated from the questionnaire after the survey is completed. If both the cover sheets and the questionnaires are numbered, they can be matched up if absolutely necessary. What is important is that people will not be able to pick up a questionnaire and see what the Jones family income is.

The same set of questions must be asked in each interview. Questionnaires that contain clearly written questions are more likely to elicit consistent and accurate responses. An additional factor to consider when designing a questionnaire is they cannot be biased or structured to favor one response over another. For example, the questions must not imply that the neighborhood will benefit or receive federal funding if respondents say they have low incomes. However, it is permissible to disclose that the survey is being conducted to gather essential information to support an application for funding under the CDBG Program.

Ideally, questions to determine household income levels and questions related to community development plan priorities are combined into the same survey instrument. Of course, a questionnaire may be designed to ask <u>only</u> the critical questions about income, or <u>only</u> questions about needs. The questionnaire should be long enough to gather needed information, yet brief enough to hold the respondent's attention.

Jurisdictions seeking funds from U.S. Rural Development (RD) sometimes conduct surveys to determine the median income level. One survey can be conducted to meet both CDBG and RD requirements by simply asking for the <u>actual</u> household income and the number of persons in the household. The sample in Attachment 3 can be easily modified to reflect this change. It is advised to test a draft questionnaire to identify questions that are unclear.

A. Income Questions - The purpose of income questions is to determine whether the household being surveyed has an income above or below the LMI limit. Therefore, income questions must provide accurate information for both household size and household income.

Since questions about income are personal, people are often reluctant to answer them. This is especially true if the reason for the question is not understood. One way to handle this problem is to structure the interview process to first explain why income information is needed, and then to ask the two essential income questions: 1) How many people live in your home? and 2) What is the total income of all members of your household?

When conducting a telephone survey, the interviewer should refer to the Income Limits, ask the size of the household, than ask, "During the past 12 months, was the total income of your household less than or more than (the income amount listed for a family of that size)?"

When conducting a door-to-door survey, the interviewer should carry a set of income cards. Each card should have the income limit for each size of household. (See Table C for an illustration of how to design income cards.) The interviewer finds the appropriate card for the household, hands it to the respondent, and asks "Would you tell me whether, during the past twelve months, the total income of <u>all</u> members of your household was above or below the figure noted on this card?"

TABLE CIllustration of Income Cards

Card Number	Persons in Household	Income Level
1	1	\$27,250
2	2	\$31,150
3	3	\$35,050
4	4	\$38,950
5	5	\$42,100
6	6	\$45,200
7	7	\$48,300
8	8	\$51,450

When conducting a mail survey, a clearly written, unbiased questionnaire that includes the two questions about income and household size should be developed. (See Attachment 3, Sample CDBG Income and Community Needs Questionnaire, page 124.)

B. Questions On Community Need and Other Data

The community needs survey is a tool which communities may use when designing a citizen participation process to identify perceived priority needs of the general community and needs of LMI persons.

Additionally, questions concerning needs allow representatives of a local unit of government to compare their own priorities with those of the community's residents. Differences in priorities may signify a need for educating the community or for redefining community priorities. For example, a community may have a severe problem with the sewage system, but the survey response indicates the community development priority of the general population, including LMI persons, is a park. In this case local government officials and staff may need to educate the community about the sewage system need, so a project agreement can be reached.

Needs questions may be developed in many different ways. Two common formats are described below:

- 1) Develop a list of potential community development needs and ask the respondent to rank them in priority order.
- 2) Ask the respondent to prioritize three or four needed community projects that should be addressed if funds were to become available.

While there is no "right" or "wrong" format, it should fit the type of survey that will be conducted. Do not, for example, ask a respondent to prioritize a long list of possible community development needs during a door-to-door survey. This may be too time-consuming and confusing. A shorter and less confusing approach when conducting a door-to-door survey might be to ask open-ended questions (Format 2) concerning community development needs.

No matter how questions concerning need are formatted, special care should be taken to ensure that the questions are not "loaded" or biased so that respondents will answer in a particular way. If a list will be used, it should include the same number of possible responses in all categories. While examples are valuable for clarification, they might encourage the respondent to target a particular need they might not previously have considered.

Step Six: Publicize Survey Process

Citizen participation may be promoted by arranging advanced notice. Respondents who know how, when, and why they will be contacted are more likely to complete a questionnaire or an interview. Local newspaper notices, announcements at churches or civic organizations, flyers and radio are means to get information to the public.

As with all aspects of the survey and questionnaire, any publicity must say that the community is applying for a CDBG grant and that, as part of the application, the community has to provide HUD and the state with current estimates of the income of the residents of the service area. <u>It is not appropriate to say that, in order for the community to receive the desired funding, a survey must be conducted to show that most of the residents of the service area have low incomes.</u>

Step Seven: Recruit And Train Survey Staff

A. Recruit staff

It is not necessary to go to great expense to hire professional interviewers. Persons from local community groups may volunteer, or colleges that offer courses on civics, public policy, or survey research may be willing to assist as a means of providing their students with practical experience and credit.

It is best to choose interviewers who can make respondents feel comfortable. For this reason, survey research companies often employ mature women as their interviewers. Also, when interviewers are of the same race and social class as the respondent, the survey generates a better response rate and more accurate results. Most important, however, is to select interviewers who will hold the attention of the respondent, ask the questions as they are written, follow respondent selection procedures, and accurately record the responses.

B. Train staff

Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an unresponsive answer, the interviewer should repeat the question exactly as written. Questions should be read in the order in which they are written. The respondent's answers should be recorded neatly and accurately as they are provided. Before proceeding to the next interview, the interviewer should edit the questionnaire to be sure that every answer is clear and accurately recorded. This simple check helps to avoid the need to re-contact the respondent for clarification.

For questions concerning income, note that there may be an important exception to reading the questions in the exact order every time. If questions pertaining to issues other than income are included, and questions on income are placed at the end of the survey, a respondent could end the interview before the critical income question is asked. If it appears to the interviewer that the respondent is about to terminate the interview, it is recommended that he or she immediately try to get an answer to the critical income question.

Step Eight: Conduct Interviews

Interviewers should attempt to contact respondents at a time when they are most likely to get a high rate of response. Telephone interviews are conducted early in the evening when most people are home. Door-to-door interviews also may be conducted early in the evening or on weekends. Attempts should be made at different times to reach anyone in the original sample who is missed by the initial round of interviews.

The interviewer should avoid selecting a time or method that will yield biased results. For example, interviewing only during the day from Monday to Friday probably will miss families where both the husband and wife work. Since these families could have higher incomes than families with only one employed member, poor timing may lead to the biased result of finding an excessively high proportion of low-income households.

Remember, interviewers also should follow the set procedures for replacing unreachables and non-respondents as discussed above in Step 3.

Step Nine: Edit Questionnaires

Interviewers should return completed surveys in to the survey coordinator. The coordinator should ensure that each survey is complete and that each question is answered clearly. Questions or errors that are found should be referred to the interviewer for clarification. Incomplete or ambiguous responses can be clarified by re-contacting the respondent. Note that editing is an ongoing process. Even after data tabulation or analysis has been started, errors may emerge in the data that need to be corrected.

Step Ten: Tabulate Survey Results

Organize and record survey data on a spreadsheet. Use the data on the spreadsheet to complete the Income Survey Worksheet, page 67.

Using spreadsheet software for tabulation may be desirable because the data can easily be checked for accuracy and consistency. However, the calculations can be made by hand or by using a calculator.

Step Eleven: Analyze Survey Results

Because the survey and subsequent tabulations result in estimates, surveyors should carefully analyze the percent of LMI households to obtain the most accurate estimates. If, after using the steps outlined above, results indicate that 55 percent or more of the households of the service area have low- and moderate-incomes, it is reasonable to assume that at least 51 percent of the residents actually have these lower incomes.

However, if the survey results and tabulation indicate that less than 51 percent of the service area households have low- and moderate-incomes, the area is presumed to be ineligible. An application for an area benefit project that <u>does not</u> benefit a minimum of 51 percent of LMI persons <u>will not</u> pass threshold review and be considered for CDBG funding.

If the survey results and tabulation indicate that between 51 and 54 percent of the service area residents have low- and moderate-incomes, it is likely that a majority of all neighborhood residents have lower incomes. Additional analysis will help determine the extent to which the estimated percentage of LMI households is correct. There are two calculations available to determine the accuracy of the estimated LMI percentage of the survey:

- A. Compare the average size of LMI households in the sample with the average size of those households with incomes above the LMI limits. The closer these figures are to each other, the more accurate the estimated low-income percentage is assumed to be. For example, if the survey indicates that 53 percent of the households are LMI, and if both below LMI households and above LMI households have an average of 3.4 persons, the surveyors can assume the 53 LMI percentage is valid.
- B. The second calculation is to compare the distribution of sizes of households below LMI with sizes of households above LMI. Use Table D to help determine this comparison.
 - 1. Count the number of one-person LMI households. Enter this figure in Column A across from number one. Next, count the number of two-person LMI households. Enter this figure in Column A across from number two. Continue this process through the "nine or more" category.
 - 2. Total Column A.
 - 3. Divide the number of one-person households by the total number of LMI households (total of Column A). Multiply by 100 to yield the percentage of one-person LMI households. Enter this percentage in Column B across from number one. Continue this process through the "nine or more" category. This percentage column should total 100 percent.

- 4. Follow steps 1 through 3 for above LMI households entering the figures in Columns C and D.
- 5. Compare the percentages in Column B of LMI households with the percentages in Column D of above LMI households for each of the nine household-size categories. The closer the distribution, the more accurate the estimated LMI percentage from the survey is assumed to be. For example, if among the LMI group, 10 percent have one person, 40 percent have two persons, and 50 percent have three persons, and among the above LMI group 12 percent have one person, 41 percent have two persons, and 47 percent have three persons, a great deal of confidence can be claimed in the estimate.

TABLE DTable For Comparing The Distribution of Household Size by Household Income

Number of Persons in the Household	Low- and	olds with Moderate- omes	Households above Low- and Moderate-Incomes					
	Column A	Column B	Column C	Column D				
	Number	Percent	Number	Percent				
One		%		%				
Two		%		%				
Three		%		%				
Four		%		%				
Five		%		%				
Six		%		%				
Seven		%		%				
Eight		%		%				
Nine or more		%		%				
Totals		%		%				

The statistical validity of the survey is increased by locating patterns of the unreachables and non-respondents, or by detecting major gaps in the sample coverage. Analyze the unreachables and non-respondents to verify that they are reasonably random by tabulating the rate of response by street or block in the service area to determine if there are notable gaps in the survey

coverage. Next, examine the racial or ethnic population of respondents and compare it with the distribution ratios of the universe or service area. If the ratios are close, the surveyors are assured that the random sample was a good representation of the racial and ethnic population of the service area.

Step Twelve: Retain Documentation Of Survey Process And Results

Maintain survey documentation consisting of completed questionnaires, a list of respondents, a description of the sampling procedures, and survey tabulations.

A. Retain completed surveys. These serve as documentation that the survey was conducted, the proper questions asked, and that the sample was adequate.

To maintain confidentiality, save the cover sheets separately from the survey questions. If necessary, they can be matched later for verification.

- **B.** Retain a list of households of the original sample and a list of households actually interviewed. Compile a list of households that were in the original sample and those households that were actually interviewed. The process used to replace unreachable or other non-respondent households should also be noted.
- **C. Retain sampling procedures.** Written documentation should describe the method used to select sample households.
- **D. Retain data.** Data may be retained by disk/CD, spreadsheet, or table.

Discussion Of Sample Sizes

Samples of the sizes suggested in Table A of this section are intended to provide an estimate of the proportion of households that say they have low- and moderate-incomes that will be within + or -5 percent of the proportion that all households in the area would indicate if all were interviewed. Thus, 200 randomly selected households were interviewed from a 350 household neighborhood and 70 percent indicated that they have low- and moderate-incomes, it can be reasonably inferred that if all 350 households were interviewed, between 65 and 75 percent of the households would say that they had low- and moderate-incomes.

In the survey being discussed in this section, the confidence interval probably will be a little less than + or -5 percent. The method here is to estimate the proportion of <u>people</u> who are income-eligible, not the proportion of <u>households</u>. Following the procedures outlined here will result in sampling a fraction of people that is approximately equal to the fraction of households that would be sampled by following Table A (number of people sampled/total number of people = number of households sampled/total number of households). Other things being equal, if the size of the universe is increased and the same sampling fraction is maintained, the confidence interval decreases.

Of course, in this application, other things may not be equal. By sampling households as a cluster for gathering data on individuals, we are departing from a purely random selection of individuals. Thus, the actual confidence can be calculated only after the data actually are collected and the variance on household size and income are analyzed. The actual confidence interval should be a little less than + or -5 percent. But we also included an "analysis" section in the paper to help in determining the extent to which it may be less than + or -5 percent.

Instructions For Using A Random Numbers Table

This attachment contains a two-page table of random numbers. It is just that-each number there is random. It can be used going up, down, sideways, or diagonally, and any column or combination of columns can be used in drawing random numbers. The following are some examples of how the table can be used.

Example 1: Drawing a Sample of 5 of 10

Assume there is a universe listing of 10 households and an interviewer wants to draw a random sample of 5 households. Look on the Random Numbers Table, Attachment 2, page 122. Find the number "53" in the upper left hand corner. Let's start with the "5" and work down the column: the numbers we find are "5, 6, 9, 1, and 3." So from the list of 10 households, our sample would include the 5th, 6th, 9th, 1st, and 3rd households on the list.

Example 2: Drawing a Sample of 5 of 100

Start this time with the "31" in the lower left hand corner of the table. Let's work across the bottom row from here, and take the numbers "31, 6, 46, 39, and 27." From the list of 100 households, our sample would include the 31st, 6th, 46th, 39th, and 27th households on the list.

Example 3: Drawing a Sample of 5 of 30

Start this time back in the upper left hand corner and start with the "53" and work across. The numbers in order are "53, 95, 67, 80, 79, 94, 28, 69, and 25." Notice that all of these numbers, except for the 25 and 28, are greater than 30. Just skip them until a number is found in the correct range. Here, sample the 28th and 25th household on your list and continue until three more (which would be the 13th, the 24th, and the 21st) are found.

Example 4: Drawing a Sample of 5 of 300

Start again with the "53" in the upper left hand corner. Well, actually let's move over one column and start with the "3 95." Since we need a three-digit number to cover the size of our universe list, we can use these three (or any three columns--each number is random.) Reading down from the "3 95," we see "3 95, 2 12, 0 16, and 0 59." From the list of 300 households, then, take the 212th, the 16th, and the 59th households (as well as how many more you needed - the next two would be the 217th and the 60th.)

1	53	95	67	80	79	94	28	69	25	78	13	24	100	62	62	21	1	44	59	90	74	63	4	97
2	62	12	27	41	5	4	19	34	84	78	71	45	73	79	33	57	2	20	79	78	68	31	25	30
3	90	16	47	72	70	2	67	21	65	7	39	58	81	6	4	79	44	47	7	74	34	55	28	90
4	10	59	4	76	80	86	82	20	60	92	33	61	76	83	73	12	8	71	82	28	21	61	31	92
5	32	17	36	64	8	30	80	95	61	33	65	5	39	88	36	44	4	86	61	13	63	15	47	92
6	54	71	27	69	41	53	60	10	2	91	76	95	98	91	64	65	2	0	90	52	26	90	49	31
7	10	60	18	77	34	59	28	99	15	11	70	34	27	78	67	19	9	60	0	22	11	12	54	50
8	42	20	24	36	78	58	82	81	45	91	35	53	30	92	57	19	9	13	39	42	25	3	97	64
9	73	55	87	48	49	97	60	92	27	78	2	55	29	76	99	21	45	24	16	33	50	84	12	65
10	21	56	41	23	58	57	49	49	70	33	6	79	95	3	70	38	26	89	49	0	68	57	53	91
11	9	60	37	99	6	41	69	97	18	44	100	18	46	3	90	57	22	35	73	97	74	9	35	82
12	63	26	41	8	21	38	15	63	38	100	68	89	24	39	19	29	95	91	70	41	95	83	33	25
13	98	72	9	45	69	50	7	86	5	80	0	8	28	96	45	0	0	26	92	51	11	11	37	91
14	87	88	65	22	98	55	86	9	65	43	64	55	80	30	15	99	26	87	22	39	97	26	50	12
15	5	91	68	44	67	2	71	96	13	73	78	3	12	87	53	9	11	32	57	72	16	35	27	51
16	75	93	62	49	95	82	30	81	24	4	11	30	71	96	49	47	65	8	91	58	40	35	32	7
17	76	15	55	38	29	0	8	20	71	42	81	51	44	76	93	42	87	51	88	65	93	80	66	91
18	26	76	93	84	8	40	96	69	84	52	89	5	16	43	34	37	64	77	85	100	52	99	36	81
19	8	35	6	83	76	8	67	81	13	33	14	86	38	25	33	22	56	36	97	89	20	59	52	9
20	59	73	37	6	26	44	0	24	89	24	78	80	20	6	9	31	32	32	32	23	57	74	49	17
21	87	94	75	45	72	15	39	100	46	99	59	12	22	98	76	16	27	41	31	99	27	24	89	16
22	5	74	8	91	37	5	13	55	13	7	19	24	76	4	25	93	75	80	98	71	37	53	57	75
23	49	60	82	39	40	51	15	71	53	65	86	60	93	31	22	64	77	46	25	2	17	69	68	56
24	2	25	92	97	41	39	98	100	99	87	44	0	99	93	31	69	26	25	71	42	26	22	96	76
25	59	41	49	100	13	0	15	33	62	61	25	59	53	8	17	76	24	25	3	2	76	57	10	18
26	40	13	20	51	81	15	12	45	16	57	47	54	92	60	70	86	98	27	95	66	23	91	73	86
27	80	29	91	36	93	59	19	9	47	61	86	89	96	18	11	56	99	67	21	24	80	60	44	42
28	48	33	7	70	61	95	51	32	89	87	72	6	40	88	52	44	19	62	12	100	62	5	17	62
29	89	5	7	93	48	60	69	97	61	21	87	68	20	4	61	63	75	92	37	35	40	70	25	86
30	97	64	36	30	99	98	23	16	66	28	58	45	34	16	64	71	48	57	15	14	24	25	55	29
31	59	73	71	62	66	34	17	41	32	65	50	73	82	7	20	55	1	86	23	19	40	61	48	95
32	68	75	43	66	66	38	50	31	25	36	26	91	36	100	88	42	74	40	33	92	18	9	34	51
33	34	16	43	38	50	28	34	14	41	2	6	97	56	73	75	17	66	83	32	25	33	32	26	75
34	14	61	81	2	6	973	3	89	79	64	67	80	75	5	66	77	97	82	52	87	25	63	11	67
35	15	39	5	99	29	36	25	40	45	28	34	63	75	18	21	23	13	14	66	70	92	44	23	73
36	68	49	1	55	11	6	63	23	50	33	60	34	82	20	66	48	27	75	74	69	9	23	66	62
37	1	72	18	84	84	66	61	41	22	61	45	36	37	16	20	26	96	39	67	100	71	8	19	29
38	58	73	55	11	9	96	81	84	21	34	50	92	65	91	69	33	23	93	3	37	95	14	84	27
39	91	63	65	63	70	90	57	20	9	13	25	77	72	0	12	30	45	89	94	6	58	72	73	16
40	39	45	31	74	91	85	29	45	98	15	11	60	26	16	36	76	1	85	15	50	27	55	0	86
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Attachment 2	2
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41	94	12	62	59	14	42	32	75	41	41	0	55	5	76	89	46	35	70	20	98	36	93	67	35
42	3	33	41	22	45	37	65	3	96	27	62	77	16	97	81	75	26	89	77	82	54	1	63	24
43	58	2	83	10	50	98	32	65	31	67	84	45	0	90	42	17	21	92	92	47	5	29	6	52
44	29	73	79	48	66	72	32	1	100	3	2	61	35	0	88	100	45	16	48	67	36	37	57	12
45	55	9	63	66	31	5	8	72	4	85	5	44	4	98	2	79	40	75	91	59	66	15	41	19
46	52	13	44	91	39	85	22	33	4	29	52	6	82	77	25	0	4	61	35	45	93	11	9	52
47	31	52	65	63	88	78	21	35	28	22	91	84	4	30	14	0	97	87	46	73	55	62	18	76
48	44	38	76	99	38	67	60	95	67	68	17	18	46	76	83	5	8	87	2	42	65	27	16	22
49	84	47	44	4	67	22	89	78	44	64	66	15	56	0	90	21	25	100	32	66	3	50	92	46
50	71	50	78	48	65	74	21	24	2	23	65	94	51	82	67	16	35	35	61	31	75	8	91	58
51	42	47	81	10	99	40	15	63	77	69	10	32	92	86	32	9	69	50	78	61	78	15	16	79
52	3	70	75	49	90	92	62	0	47	90	78	63	44	60	13	55	28	63	92	17	100	2	40	93
53	31	6	46	39	27	93	81	79	100	94	43	39	79	2	18	82	40	31	81	84	62	41	59	4

Sample CDBG Income and Community Needs Questionnaire

(Use the Income Limits contained in the most recent CDBG General Purpose Application Handbook to enter the income in the last column of 1.)

1.		our household and, following the same line across e" or "below" the corresponding income figures.
	1 person: income is above or 2 persons: income is above or 3 persons: income is above or 4 persons: income is above or 5 persons: income is above or 6 persons: income is above or 7 persons: income is above or 8 persons: income is above or above or above or above or	below annual income \$
2.		nk are the priority needs in your community. We eing the highest, and #10 being the lowest) in the
	Sewer System Housing Rehab. Projects Park and Rec., School Senior Center Streets and Sidewalks	Water System Improvements Increased Fire Protection Community Center Day Care Other (please list):
3.	☐ I am 62+ years of age	☐ I am less than 62 years of age
4.	PRESENT EMPLOYMENT STATUS:	
	Employed	Part-time Employment
	Unemployed	Retired
Co	mments:	
	•	eet both CDBG and USDA-RD requirements by simply

Instructions For Completing The Income Survey Worksheet

The Income Survey Worksheet is used to summarize the results of an income survey, establishing a percentage of LMI persons in the service area of the proposed project. Most questions are self-explanatory. Make sure answers are logical. For example, the number on Line 4 cannot be smaller than the number on Line 3 (because every household must have at least one person). Similarly, the number on Line 6 cannot be less than the number on Line 5. Also note that the number on Line 3 plus the number on Line 5 should equal the number on Line 2--every household is either LMI or it is not.

- Line 1. Enter the most current estimate of the total number of households in the service area.
- Line 2. For the number of households interviewed, enter the total number of interviews with complete and accurate responses to the income and size of household questions.
- Line 3. Based on income and household size information contained in the survey, determine the number of LMI households interviewed.
- Line 4. Enter the total number of persons living in all households that were determined to be LMI.
- Line 5. Based on the income and household size information, determine the total number of households interviewed in which income was above the LMI level.
- Line 6. Enter the total number of persons living in all households that were determined to be above the LMI level.

For purposes of illustration, assume the service area is estimated to contain 650 households (Line 1). Assume 250 households (Line 2) were interviewed and 130 had low- and moderate-incomes (Line 3). These LMI households contained 450 persons (Line 4). The 120 households with incomes above the LMI level (Line 5) contained 400 persons (Line 6). Complete Lines 7 through 16 as follows:

- Line 7. If the households interviewed contained 450 LMI persons in 130 households, the number on Line 7 would be 3.46 (450/130).
- Line 8. If the households interviewed contained 400 non-LMI persons in 120 households, the number on Line 8 would be 3.33 (400/120).
- Line 9. If a total of 250 households were interviewed, 130 of which had low- and moderate-incomes, the number on Line 9 would be .52 (130/250).

Instructions For Completing The Income Survey Worksheet

- Line 10. If 120 of the 250 households interviewed did not have low- and moderate-incomes, the number on Line 10 would be .48 (120/250).
- Line 11. If the service area contained an estimated 650 households, and 250 interviewed, of which 130 had low- and moderate-incomes, the number on Line 11 would be 338 (650 X .52).
- Line 12. Continuing with the example, Line 12 would be 312 (650 X .48).
- Line 13. 3.46 persons per LMI household times 338 LMI households--Line 13 would be 1,169.
- Line 14. 3.33 persons per non-LMI household times 312 non-LMI households--Line 14 would be 1,039.
- Line 15. Total LMI persons (1,169) plus total non-LMI persons (1,039)--Line 15 would be 2,208 estimated total persons.
- Line 16. 1,169 LMI persons divided by 2,208 total persons yields about .5294. Multiplied by 100, this gives an estimate that 52.94 percent of the residents have low- and moderate-incomes.

Attachment 4

Income Survey Worksheet

1.	Enter the estimated total number of households in the service area.	
2.	Enter the total number of households interviewed.	
3.	Enter the total number of LMI households interviewed.	
4.	Enter the total number of persons living in the LMI households interviewed.	
5.	Enter the total number of households interviewed in which the income was above the LMI level.	
6.	Enter the total number of persons living in the households interviewed in which the income was above the LMI level.	
7.	Divide Line 4 by Line 3. (This is the average size of the LMI household interviewed.)	
8.	Divide Line 6 by Line 5. (This is the average size of the non-LMI household interviewed.)	
9.	Divide Line 3 by Line 2. (This is the percentage of households interviewed that have low- and moderate-incomes.)	
10.	Divide Line 5 by Line 2. (This is the percentage of households interviewed that do not have low- and moderate-incomes.)	
11.	Multiply Line 1 by Line 9. (This is the estimate of the total number of LMI households in the service area.)	
12.	Multiply Line 1 by Line 10. (This is the estimate of the total number of non-LMI households in the service area.)	
13.	Multiply Line 7 by Line 11. (This is the estimate of the total number of LMI persons in the service area.)	
14.	Multiply Line 8 by Line 12. (This is the estimate of the total number of non-LMI persons in the service area.)	
15.	Add Line 13 and Line 14. (This is the estimate of the total number of persons in the service area.)	
16.	Divide Line 13 by Line 15, and multiply the resulting decimal by 100. (This is the approximate percentage of persons in the service area who have low- and moderate-incomes.	

FEDERAL AND STATE REGULATIONS

Jurisdictions receiving CDBG funds must follow a number of federal and state regulations. These laws cover a wide range of activities, such as labor practices, environmental impacts, and civil rights. Listed below are some of the most important regulations that could apply to projects involving CDBG funds. This is a preliminary list and by the time funds are released, it could change, depending upon actions at the federal level. Each regulation is annotated to give the applicant some idea of the requirements that must be met. Since this is only a summary and is not meant to be a comprehensive description of each law, please contact the Department of Community, Trade and Economic Development if you need more detailed information.

Federal Regulations

Public Law 88-352, Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) (24 CFR Part 1)

The law provides that no person in the United States shall, on the grounds of race, color, or national origin, be denied the benefits of, be excluded from participation in, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Public Law 90-284, Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3601 et seq.)

The law prohibits any person from discriminating in the sale or rental of housing, the financing of housing or the provisions of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, handicap, familial status, or national origin.

Executive Order 11063, As Amended by Executive Order 12259 (24 CFR Part 107)

Necessary and appropriate action must be taken to prevent discrimination because of race, color, religion, creed, sex or national origin; in the sale, leasing, rental and other disposition of residential property and related facilities (including land to be developed for residential use); or in the use or occupancy thereof if such property and related facilities are, among other things, provided in whole or in part with the aid of loans, advances, grants or contributions from the federal government.

Section 104(b)4 of the Housing and Community Development Act of 1974, As Amended

The Grantee must comply with the provisions of Section 104(b)4 of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee will identify its community development and housing needs, including the needs of low-income persons and the activities to be undertaken to meet such needs.

Section 104(1) of the Housing and Community Development Act of 1974, As Amended through 1992. Protection of Individuals Engaged in Nonviolent Civil Rights Demonstration

The grantee must comply with the provisions of Section 104(1) of the Housing and Community Development Act of 1974, as amended through 1992, which requires that the Grantee must adopt and enforce a policy of prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and it must adopt and enforce a policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction.

Section 109 of the Housing and Community Development Act of 1974, As Amended through 1992

No person in the United States shall, on the grounds of race, religion, color, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with federal community development funds made available pursuant to Title I of the Act.

Age Discrimination Act of 1975, As Amended (42 U.S.C. 6101 et seq.)

No person shall be excluded from participation, denied program benefits, or subjected to discrimination on the basis of age under any program or activity receiving federal funding assistance.

Section 504 of the Rehabilitation Act of 1973, As Amended (29 U.S.C. 794)

No otherwise qualified individual shall, solely, by reason of his or her handicap, be excluded from participation (including employment), denied program benefits or subjected to discrimination under any program or activity receiving federal assistance funds.

Section 3 of the Housing and Community Development Act of 1968 (12 U.S.C. 170 u) (24 CFR Part 135)

To the greatest extent feasible, opportunities for training and employment should be given to lower income persons residing within the unit of local government or the non-metropolitan county in which the project is located, and contracts for work in connection with the project should be awarded to eligible business concerns which are located in, or owned in substantial part, by persons residing in the project area.

Executive Order 11246, As Amended

Executive Order 11246 as amended applies to all federally assisted construction contracts and subcontracts. The grantee and subcontractors, if any, shall take affirmative action to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex or national origin. The grantee or subcontractors will make their books and records available to state and federal officials for purposes of investigation to ascertain compliance.

Section 110 of the Housing and Community Development Act of 1974, As Amended through 1992

All laborers and mechanics employed by contractors or subcontractors on construction work assisted under the Act shall be paid wages at rates not less than those prevailing on similar construction in the locality as determined by the Secretary of Labor in accordance with the Davis-Bacon Act, as amended (40 U.S.C. 276-a- 276a-5). However, these requirements apply to rehabilitation of residential property only if such property is designed for residential use for eight or more families.

Davis-Bacon Act, As Amended (40 U.S.C. a - et seq.), Section 2; June 13, 1934, As Amended (48 Stat. 948.40 U.S.C. 276(c), Popularly Known as The Copeland Act

This Act mandates that all laborers and mechanics be paid unconditionally and not less often than once a week, and without subsequent deduction or rebate on any account except "permissible" salary deductions, the full amounts due at the time of payments, computed at wage rates not less than those contained in the wage determination issued by the U.S. Department of Labor. Weekly certified payrolls are required to be submitted to the federally-funded recipient by the contractor.

Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.)

According to this Act, no contract work may involve or require laborers or mechanics to work in excess of 40 hours in a work week, unless compensation of not less than one and one-half times the basic rate is paid for the overtime hours. If this Act is violated, the contractor or subcontractor is liable to any affected employee for unpaid wages as well as to the United States for liquidated damages.

Section 104(g) of the Housing and Community Development Act of 1974, As Amended through 1992

Recipients of community development funds made available pursuant to Title 1 of the Act assumes all the responsibilities for environmental review, decision-making, and action pursuant to the National Environmental Policy Act of 1969, that would apply to the Secretary of HUD were he to undertake such projects as federal projects.

The National Environmental Policy Act of 1969 (42 U.S.C. Section 4321, et seq. and 24 CFR Part 58)

The purpose of this Act is to attain the widest use of the environment without degradation, risk to health or safety or other undesirable and unintended consequences. Environmental review procedures, including completing a checklist and determining and publishing a Finding of Significance or No Significance for a proposal, are a necessary part of this process. Pursuant to these provisions, the grantee must also submit environmental certifications to the Agency when requesting that funds be released for the project.

The Clean Air Act, As Amended (42 U.S.C. 7401, et seq.)

The Clean Air Act prohibits (1) engaging in, (2) supporting in any way or providing financial assistance for, (3) licensing or permitting or (4) approving any activity which does not conform to the state implementation plan for natural primary and secondary ambient air quality standards.

<u>HUD Environmental Standards (24 CFR, Part 51, Environmental Criteria and Standards and 44 F.R. 40860-40866, July 12, 1979)</u>

The HUD Environmental Standards prohibit HUD support for most new construction of noise-sensitive uses on sites having unacceptable noise exposure. HUD assistance for the construction of new noise-sensitive uses is prohibited in general for projects with unacceptable noise exposures and is discouraged for projects with normally unacceptable noise exposure.

Executive Order 11990, May 24, 1977: Protection of Wetlands (42 F.R. 26961, et seq.)

The intent of this Executive Order is (1) to avoid, to the extent possible, adverse impacts associated with the destruction or modification of wetlands; and (2) to avoid direct or indirect support of new construction in wetlands wherever there is a practical alternative. In making this determination, the grantee may take into account economic, environmental, and other pertinent factors.

The Wild and Scenic Rivers Act of 1968, As Amended (16 U.S.C. 1271, et seq.)

The purpose of this Act is to preserve selected rivers or sections of rivers in their free-flowing condition, to protect the water quality of such rivers, and to fulfill other vital national conservation goals. Federal assistance by loan, grant, or other mechanism cannot be provided to water resources construction projects that would have a direct and adverse effect on any river included or designed for study or inclusion in the National Wild and Scenic River System.

Executive Order 11988, May 1978: Floodplain Management (42 F.R. 26951, et seq.)

The intent of this Executive Order is to (1) avoid, to the extent possible, adverse impacts associated with the occupancy and modification of floodplains and (2) avoid direct or indirect support of floodplain development wherever there is a practical alternative. If the grantee proposes to conduct, support or allow an action to be located in the floodplain, the grantee must consider alternatives to avoid adverse effects and incompatible involvement in the floodplains. If siting in a floodplain is the only practical alternative, the grantee must, prior to taking any action: (1) design or modify its actions in order to minimize a potential harm to the floodplains; and (2) prepare and circulate a notice containing an explanation of why the action is proposed to be located in a floodplain.

Coastal Zone Management Act of 1972, As Amended (16 U.S.C. 1451, et seq.)

The intent of this is to preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone. Federal agencies cannot approve assistance for proposed projects that are inconsistent with the state's coastal management program, except upon a finding by the U.S. Secretary of Commerce that such a project is consistent with the purpose of this chapter or necessary in the interests of national security.

The Endangered Species Act of 1973, As Amended (16 U.S.C. 1531, et seq.)

The intent of this act is to ensure that all federally assisted projects seek to preserve endangered or threatened species. Projects must not jeopardize the continued existence of endangered and threatened species or result in the destruction of or modification of habitat of such species, which is determined by the U.S. Department of the Interior, after consultation with the state, to be critical.

The Reservoir Salvage Act of 1960 (16 U.S.C. 469 et seq.), Section 3 (16 U.S.C. 469 a-1), As Amended by the Archaeological and Historic Preservation Act of 1974)

The Reservoir Salvage Act provides for the preservation of historical and archaeological data (including relics and specimens) that might otherwise be irreparably lost or destroyed as a result of any alteration of the terrain caused by any federal construction project or federally-licensed activity or program. Whenever any federal agency finds, or is notified in writing by an appropriate historical or archaeological authority, that its activities in connection with any federal construction project or federally-licensed project, activity or program may cause irreparable loss or destruction of significant scientific, prehistoric, historical or archaeological data, the federal agency must notify the U.S. Secretary of Interior in writing and provide appropriate information concerning the project, program or activity.

The Safe Drinking Water Act of 1974 (42 U.S.C. Section 201, 300(f) et seq. and U.S.C. Section 349 as amended, particularly Section 1424(e) (42 U.S.C. Section 300H-303(e))

The Safe Drinking Water Act, as amended, is intended to protect underground sources of water. No commitment for federal financial assistance, according to this Act, shall be entered into for any project which the U.S. Environmental Protection Agency determines may contaminate an aquifer which is the sole or principal drinking water source for an area.

The Federal Water Pollution Control Act of 1972, As Amended including the Clean Water Act of 1977, Public Law 92-212 (33 U.S.C. Section 1251, et seq.)

The Water Pollution Control Act, as amended, provides for the restoration of chemical, physical and biological integrity of the nation's water.

The Solid Waste Disposal Act, As Amended by the Resource Conservation and Recovery Act of 1976 (42 U.S.C. Section 6901, et seq.)

The purpose of this Act is to promote the protection of health and the environment and to conserve valuable material and energy resources.

The Fish and Wildlife Coordination Act of 1958, As Amended (16 U.S.C. Section 661, et seq.)

The Act assures that wildlife conservation receives equal consideration and is coordinated with other features of water resource development programs.

EPA List of Violating Facilities

Grantees must ensure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the program are not listed on the U.S. Environmental Protection Agency's list of Violating Facilities and that it will notify the Agency of the receipt of any communication from the Director of the EPA office of Federal Activities indicating that a facility to be used in the project is under consideration for listing by EPA.

Executive Order 11593, and the Preservation of Archaeological and Historical Data Act of 1966 (16 U.S.C. 469 a-1, et seq.)

Grantees must, in connection with its performance of environmental assessments under the NEPA take the following steps:

- 1. Consult with the State Historical Preservation Officer to identify properties listed in or eligible for inclusion in the National Register of Historic Places that are subject to adverse effects (see 36 CFR Part 800.0) by the proposed activity; and
- 2. Comply with all requirements established by the state to avoid or mitigate adverse effects upon such properties.

<u>The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4630)</u> as Amended in 1989

Grantees must inform affected persons of their rights and of the acquisition policies and procedures set forth in the regulations of 49 CFR Part 24 and 24 CFR 570.496(a).

The grantee must also certify that it is following a "residential anti-displacement and relocation assistance plan." The plan must contain two components -- a requirement to replace all low income dwelling units that are demolished or converted to a use other than low income housing as a direct result of the use of CDBG assistance and a relocation assistance component.

The grantee must provide relocation payments and offer relocation assistance as described in the Act to all persons displaced as a result of rehabilitation, demolition, or acquisition of real property for an activity assisted under the Community Development Block Grant Program. Such payments and assistance must be provided in a fair and consistent and equitable manner that ensures that the relocation process does not result in a different or separate treatment of such persons on account of race, color, religion, national origin, familial status, handicap, sex or source of income.

The grantee must assure that, within a reasonable period of time prior to displacement, decent, safe, and sanitary replacement dwellings will be available to all displaced families, individuals, businesses, nonprofit organizations, and farms and that the range of choices available to such persons will not vary on account of their race, color, religion, national origin, familial status, handicap, sex, or source of income.

Section 104(d) of the Housing and Community Development Act of 1974, As Amended through 1992

Grantees must adopt a residential anti-displacement and relocation assistance plan. The plan must: (1) provide for one-for-one replacement of low income dwelling units demolished or converted to use other than low- to moderate-housing as a direct result of the use of CDBG assistance; (2) provide for relocation assistance; and (3) describe steps to minimize displacement.

Title IV of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831) prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance.

Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments (24 CFR Part 85)

Grantees must comply with the guidelines of Federal Circular A-87, which sets forth principles and standards for determining the costs allowable under grants and contracts involving federal funds.

<u>U.S. Office of Management and Budget Circular A-102, "Uniform Administrative Requirements for Grants-in-Aid to State and Local Governments"</u>

Grantees must comply with OMB Circular A-102 or any equivalent procedures and requirements that the state may prescribe. The Circular is the basis for a number of specific requirements on the financial management and record keeping of CDBG funds. The directive applies to cash depositories, bonding and insurance, record keeping, program income, property management, procurement, close-out, audit, and other requirements. The following Attachments to OMB Circular A-102 do not specifically apply to the grantee's project: "Attachment D - Waiver of Single State Agency Requirements," "Attachment F - Matching Share," and "Attachment M - Standard Forms for Application."

Non-Federal Government Audit Requirements (24 CFR Part 44)

Grantees must comply with the requirements of 24 CFR Part 44, which requires that any Grantee receiving \$100,000 in federal funds, during any year, to have an audit performed for that year. Grantees receiving between \$25,000 and \$100,000 in federal funds, during any year, shall have an audit performed in accordance with generally accepted auditing standards and the following federal auditing standards:

- A. Standards for Audit of Governmental Organizations, Programs, Activities, and Functions, issued by the U.S. General Accounting Office (GAO);
- B. The Single Audit Act of 1984 (P.L. 98-502); and
- C. Circular A-133, Audits of State, Local Governments and Non-Profit Organizations issued by the U.S. Office of Management and Budget (OMB).

State Regulations

Prevailing Wages, RCW 39.12

This statute mandates that prevailing wages, as determined by the State Department of Labor and Industries, be paid to workers performing under public works contracts.

Uniform Relocation Assistance and Real Property Acquisition Policy Act, RCW 8.26

Grantees must comply with the provisions of Chapter 8.26 RCW and WAC 365-24 when its activities involve any acquisition of real property assisted under this contract and or the displacement of any family, individual, business, nonprofit organization or farm that results from such acquisition.

State Environmental Policy Act (SEPA, RCW 43.21(c)

Local agencies will (1) require environmental checklists from private and public entities considering an action potentially subject to an Environmental Impact Statement requirement of SEPA; (2) make "threshold determinations that such an action will not have a significant environmental impact; (3) provide for the preparation of draft and final EIS if the determination under (2) above is yes; and (4) circulate such EIS's to other agencies and interested parties.

Shoreline Management Act, RCW 90.58

This Act defines a planning program and a permit system which are initiated at the local government level under state guidance. Its purpose is to protect and enhance the state's shorelines, and it includes a comprehensive shoreline inventory process and master program for regulation of shoreline uses. A permit application at the local level must be in compliance with those plans if substantial developments and shoreline modifications occur, and a record of the application and decision must be submitted to the state.

State Building Code, RCW 19.27, and Provisions in Buildings for Aged and Handicapped Persons, RCW 70.92

Grantees must comply with the provisions of Chapter 19.27 RCW and Chapter 70.92 RCW and regulations for Barrier Free Facilities adopted by the Washington State Building Code Advisory Council pursuant to these statutes.

The State Building Code provides for a uniform state building code and mandates counties, cities and towns to administer and enforce its provisions. Local governments are authorized to modify the state building code to fit local conditions as long as such modifications do not provide for weaker control than the minimum standards and objectives called for in the state code.

State Noise Control Act of 1979, RCW 70.107

Objectives of this Act are to assist local governments in implementing local noise ordinances and to control and reduce excessive noise in Washington State.

State Open Public Meeting Act, RCW 42.30

All meetings of the governing body which pertain to this contract shall be open to the public except those where specific provision is made for executive sessions pursuant to Section 42.30.110 of the statute.

RCW 49.60 Law Against Discrimination

Grantees must comply with the provisions of Chapter 49.60 RCW in all activities relating to this contract.

RCW 39.39 Interlocal Cooperation Act

The Interlocal Cooperation Act establishes, as state policy, the authority for local governments, including special purpose districts and Indian tribes, to enter into agreements for providing a broad spectrum of cooperative services. Local governments undertaking joint community development projects can use this Act as a means for establishing interlocal agreements.

State Coastal Zone Management Program

Grantees must consult with the State Coastal Zone Management Agency (Department of Ecology) and must certify that the project is consistent with the State Coastal Zone Management Program.

Governor's Executive Order 89-10, December 11, 1989: Protection of Wetlands, and Governor's Executive Order 90-04, April 21, 1990: Protection of Wetlands

Grantees must ensure that any activities that would adversely affect wetlands are avoided and unavoidable impacts are mitigated. For the purposes of this requirement, mitigation means: (1) avoiding the impact altogether by not taking certain action or part of an action; (2) minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts; (3) rectifying the impact by repairing, rehabilitating, or restoring the affected environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; (5) compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and (6) monitoring the impact and taking appropriate corrective actions.

Emergency work that is essential to save lives and protect property and public health is exempt from these provisions.



washington state department of community, trade and economic development

Subvención Global Para Desarrollo Comunitario

División de Gobierno Local

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Introducción:

El programa de Subvención Global para Desarrollo Comunitario del Estado de Washington (CDBG) proporciona fondos sobre una base competitiva para vivienda local, instalaciones públicas y comunitarias, desarrollo económico y proyectos de planificación que benefician principalmente a los hogares de ingresos bajos y moderados.

Los fondos para el programa CDBG del Estado de Washington son despendidos por el Departamento de Viviendas y Desarrolló Urbano de los Estados Unidos. El Programa de Subvención para el Desarrollo Comunitario (CDBG) de estado de Washington esta deseando para financiar hogares locales, albergues públicos, desarrollos económicos y desarrollar proyectos cuyo **propósito** principal es beneficiar a las familias de bajos y moderados recursos económicos. Esto resultar en un benefició para toda la comunidad.

Fondos Disponibles

Históricamente, se han distribuido aproximadamente \$15 millones en fondos federales sobre una base anual, a través de los siguientes propuesto fondos de concesión:

Concesión de Propósito General

\$7,000,000

Contacto: Bill Prentice

Ciclo de concesión anual durante el cual los solicitantes elegibles pueden pedir hasta \$1,000,000 por solicitud para proyectos de vivienda local, instalaciones públicas, instalaciones de la comunidad, o de desarrollo económico/microempresas, principalmente en beneficio de personas de ingresos bajos y moderados. La fecha de vencimiento para el ciclo de concesión de 2006 es el 17 de noviembre de 2005, con anuncio de la decisión en el medio de Marzo 2006.

Concesión de Fondos de Inversión de la Comunidad Contacto: Dan Riebli \$3,356,516

Proporciona ayuda técnica y financiera a comunidades elegibles de arriba a \$1,000,000 por la aplicación a través del año en un fondos la base disponible para la comunidad y proyectos económicos de desarrollo identificó por un proceso local de la priorización. La ayuda se coordina con el Equipo del Recurso del departamento.

Concesión para Planificación Solamente

\$ 500,000

Contacto: Sheila Lee-Johnston

Las Concesiones para Planificación Solamente se proporcionan a las comunidades elegibles sobre una base de disponibilidad de fondos, para una gama amplia de actividades de planificación dirigidas hacia la salud pública y asuntos de seguridad; para responder a los mandatos estatales y federales; para mejorar servicios esenciales para individuos de ingresos bajos y moderados; o, para completar los pasos necesarios dentro de una estrategia de desarrollo comunitario más amplia. Se encuentran disponibles concesiones de hasta \$35,000. El consorcio de solicitantes elegibles puede solicitar hasta \$50,000.

Requisitos de Participación Ciudadana Federal Para Solicitantes del Gobierno Local al Programa de CDBG

Regulación Federal 24 CFR 570.486(a)

- (a) Requisitos de participación ciudadana de una unidad general del gobierno local. Cada unidad general del gobierno local, debe cumplir los siguientes requisitos como es solicitado por el estado, en el Sec. 91.115(e) de este artículo.
 - (1) Contribuir y motivar a la participación ciudadana, particularmente en personas de recursos bajos y moderardos quienes residen en condiciones precarias o áreas insalubres y áreas donde el Programa de CDBG tiene como objetivo apoyar con financiamiento;
 - (2) Asegurar que los ciudadanos tengan acceso oportuno y suficiente a reuniones locales, información y estadísticas relacionadas a la unidad de gobierno local que ha sido propuesta o que utiliza los fondos de financiamiento del programa de CDBG;
 - (3) Proveer información a los ciudadanos, incluyendo:
 - i. La cantidad de financiamientos del de CDBG que se espera sea otorgada en el año fiscal en curso (incluyendo las subvenciones y los ingresos anticipados del programa):
 - ii. El tipo de actividades probables a llevarse a cabo con el financiamiento del de CDBG:
 - iii. La cantidad estimada de financiamientos del de CDBG propuesta para ser usada en actividades que cumplirán con él objetivó nacional de beneficiar a personas de bajos recursos económicos; y
 - iv. Las actividades propuestas del programa de CDBG que son probables de resultar declinadas y la unidad general de gobierno y los planes de reemplazo requeridos bajo el Sec. 570.488
 - (4) Proveer asistencia técnica a grupos representativos de personas de bajos y moderados recursos que soliciten ayuda en el desarrollo de sus propuestas de acuerdo con el procedimiento desarrollado por el estado. Dicha asistencia no incluye proveer financiamiento a tales grupos;
 - (5) Participar en un mínimo de dos audiencias públicas, cada una en diferentes etapas del programa, con el propósito de obtener puntos de vista de los ciudadanos y responder a propuestas y preguntas. La audiencia en conjunto debe cubrir las necesidades de casa y desarrollo en la comunidad, desarrollo de actividades propuestas y la revisión del cumplimiento del programa. La audiencia pública que cubre el desarrollo de la comunidad y las necesidades de casa debe ser llevada a cabo en la fecha y lugares convenientes a beneficiarios actuales a potenciales, con lugares accesibles para discapacitados. Las audiencias publicas deben llevarse a cabo de cierta forma que cumplan las necesidades de residentes que no hablen Inglés ya que se espera que un numero razonable de estos participe en el programa.
 - (6) Informar a los ciudadanos con suficiente anticipación, y oportunidad de comentar al respecto, sobre actividades propuestas en solicitud al estado y, por subvenciones ya efectuados, actividades que sean propuestas para agregarse, eliminarse a ser cambiadas substancialmente de la solicitud de unidad general de gobiernos locales al estado. Cambiadas substancialmente significa que los cambios sean en términos de objetivó, alcance, lugar o beneficiario, como es definido bajo el criterio establecido por el estado.
 - (7) Proveer a los ciudadanos la dirección, el teléfono y las fechas y horario para entregar quejas y objeciones, y proveer oportunas respuestas por escrito a quejas entregadas por escrito, dentro de los primeros 15 días hábiles, cuando así pueda aplicarse.